

7 Radiation Protection Adviser Consultation and Advisory Visits

Scope

1. This Chapter sets out those aspects of working with ionising radiation where there is a statutory requirement for consultation with a Radiation Protection Adviser (RPA), and where consultation is expected or advised. Information is also provided on the need for advice visits by an RPA.

Statutory Requirements

2. In addition to the general requirements of the Health and Safety at Work etc. Act 1974 and the Management of Health and Safety at Work Regulations 1999, the following specific legislation applies directly:

- a. Ionising Radiations Regulations 2017 (IRR17).

Duties

3. Duties as detailed in Chapter 39 apply. In addition, the following duties also apply

Radiation Protection Adviser Consultation and Appointment

4. An RPA is to be appointed in writing, preferably at TLB level, and provided with the scope of advice required in accordance with the policy at Part 1 Chapter 2. Before appointing an RPA, the suitability of the RPA, in terms of the required knowledge, experience and competence for giving the type of advice required, must be established.

5. Where there is no on-site RPA, RPA visits will be made on a periodic basis as decided by the TLB. Decisions on the required day to day level of consultation with an RPA are to be made at unit or establishment level. The appointed RPA will normally be available to advise on any aspect of radiation protection, whether or not required under IRR17.

Statutory Consultation

6. There is a statutory requirement for the radiation employer (Commanding Officer / Head of Establishment ((CO / HoE)) to consult an RPA on each of the following matters:

- a. The implementation of requirements to controlled and supervised areas;
- b. the prior examination of plans for installations and the acceptance into service of new or modified sources of ionising radiation in relation to any engineering controls, design features, safety features and warning devices provided to restrict exposure to ionising radiation;

c. the regular calibration of equipment provided for monitoring levels of ionising radiation and the regular checking that such equipment is serviceable and correctly used (see also Chapters 4 and 8); and

d. the periodic examination and testing of engineering controls, design features, safety features and warning devices and regular checking of systems of work provided to restrict exposure to ionising radiation.

7. It is a statutory requirement that the employer (CO / HoE) must provide the appointed RPA with adequate information and facilities for the performance of their functions.

Statutory Requirement for RPA Consultation on Critical Examination by an Installer or Erector

8. Whenever an article is erected or installed for use in work with ionising radiation, the erector / installer must, where appropriate, undertake a critical examination of the way in which the article was erected or installed regarding, in particular, that safety features and warning devices operate correctly and that there is sufficient protection for persons from exposure to ionising radiations. As part of this process, the installer / erector must consult with their RPA or with the RPA of the radiation employer (CO / HoE) regarding the nature and extent of the critical examination and the results of it. See also Chapter 1.

Consultation Requirements for Observance of IRR17

9. In addition to those areas set out above consultation is required where advice is necessary for compliance with IRR17. This includes:

a. procurement of new equipment involving ionising radiation or radioactive substances (see Chapter 1);

b. undertaking the risk assessment required by regulation 8 (see Chapter 2);

c. designation of controlled and supervised areas required by regulation 17 (see Chapter 4);

d. undertaking investigations required by IRR17 (see Chapter 14);

e. developing contingency plans required by regulation 13 (see Chapter 40); and

f. dose assessment and recording required by regulation 22 (see Chapter 6);

10. In addition to these areas the advice of an RPA may be needed in other areas such as:

a. selection and use of personal protective equipment where required (see Chapter 4);

- b. designation of classified persons (see Chapter 6);
- c. arrangements for outside workers, i.e. arrangements for persons who are required to enter a controlled area of any employer (other than that of their own employer);
- d. appointments and training; and
- e. compliance with other legislation relating to ionising radiation or radioactive substances (see also Chapter 3).

Radiation Protection Advice Visits

11. All MOD units and establishments holding radioactive materials or using equipment emitting ionising radiation, which have appointed or wish to consult with an RPA will normally receive visits from their RPA. The Dstl RPA Body will generally be able to conduct such visits and provide radiation protection advice, if appointed.

12. The RPA, usually the Dstl RPA Body, will liaise with each Navy, Army, RAF, JFC and Defence Agency establishment to agree a mutually convenient date for the visit. The RPA will provide details of aspects to be examined during the visit.

Frequency of radiation protection advice visits

13. The frequency of advice visits will depend upon the degree of potential radiation hazard likely to be involved. Visits are to be arranged as part of a predetermined programme and will typically be undertaken at a frequency of between one and three years.

14. The RPA is to be consulted for advice on the particular visit frequency for an individual unit or establishment. The visit frequency may be varied at the discretion of the RPA, in agreement with the appropriate TLB.

Additional advice visits

15. In addition to the programmed advice visits described above, CO / HoEs of units and establishments under Single Service arrangements may request additional advice visits and support from the appointed RPA to provide assistance on specific aspects of radiation protection.

Notification of inspections by external regulatory bodies

16. Any unit or establishment which has been notified by the HSE, or any other statutory inspecting body, that they wish to make a radiation protection inspection are to immediately inform the RPA and, where appropriate, the TLB safety authority.

Records

17. Following each advice visit the RPA is to provide a summary of the advice given and any recommendations made. Generally, the RPA will provide written advice. The radiation employer (CO / HoE), or their representative, is to maintain records of all advice received, including details of any advice provided verbally.