

Minutes of the 3rd meeting of the 3rd

Radiological Protection Advisory Committee (RPAC)

Thursday, 30th May 2024 – Irish Management Institute, Sandyford Road, Dublin

Members present:	Tom Ryan - EPA (Chair) John Tuffy – Health Information Quality Authority Mary O’Mahony – Health Service Executive Helen Hourihane – Health and Safety Authority Luis Leon Vintro - Royal Irish Academy Sean Curran – Medical Council Heinz Peter Nasheuer – Irish Radiation Research Society Stephen Thomas – Environmental Pillar Wayne Anderson – Food Safety Authority of Ireland Andrew Bolas – Dental Council Carol Robinson – Norwegian Radiation Protection Authority Gareth Thomas – UK Office of Nuclear Regulation Antony Bexon – UK Health Security Agency Paul Dorfman – Nuclear Free Local Authorities
EPA staff in attendance:	Andy Fanning - Programme Manager, ORM Noel Byrne – Programme Manager, OEE David Fenton – Manager Radiation Protection Regulation, OEE Kevin Kelleher – Manager Emergency Preparedness and Nuclear Safety, EMF, ORM Veronica Smith – Manager Dublin Laboratories, ORM
Apologies:	Micheál Lehane – ORM Director, EPA John Upton – Irish Association of Physicist in Medicine Paula Barry Walsh - Veterinary Council Michele Monahan – Irish Institute of Radiographers and Radiation Therapists Susan McCready-Shea – Society for Radiological Protection Carole Rousse – French Radiation Protection Authority (Autorité de Sûreté Nucléaire)
Secretary:	Catherine Scully

1. Welcome and Introductions

Dr Tom Ryan, Chair of the Committee, opened the meeting by thanking the members, on behalf of the EPA Board, for their contributions over the last number of meetings. The minutes of the last meeting held on the 8th November 2023 (virtual) were approved with a correction to be made to the numbering of meetings. The Chair also reminded the RPAC members of the committee’s Terms of Reference including its advisory role to the EPA and spoke about the governance of the advisory committee, including confidentiality and conflict of interest.

The Chair gave an update on matters raised at the meeting of the 8th November 2023:

- The National Dose Report will be published by late June/early July. Further to committee advice an informational seminar will be held to disseminate the results. RPAC members will be invited to the seminar.
- Since the last RPAC meeting the EPA have been in contact with the Swiss colleague who led on a HERCA paper on Proton Therapy Licensing and inspection developed by a HERCA WG on medical applications. This outreach has been helpful in those identifying who could assist EPA if Proton Therapy develops in Ireland.
- The EPA have had extensive outreach among the Radiotherapy RPA community in the context of developing guidance on the authorisation of linear accelerators. The EPA has not received any enquiries on proton therapy in Ireland despite there being an on-going programme of linear accelerator replacement in the country.
- EPA is aware of the importance of engagement with the regulated community to help ensure regulations are understood and so aid compliance. The Radiation Protection Regulation (RPR) service is accredited to ISO 17020 which also calls for active stakeholder engagement. In this context RPR arrange specific stakeholder events, it contributes to events organised by stakeholders and regularly interacts with agencies and colleagues abroad. Such engagement includes Radiation Protection Advisor (RPA) Liaison Day, the Radiation Protection Officer (RPO) Study Day, regular meetings with HIQA, attendance at the Heads of European Radiological Protection Competent Authorities (HERCA), liaison with UK and Northern Ireland colleagues and webinars to the dental community.

2. Issues arising from the decommissioning of Linear Accelerators

Due to the aging profile of Ireland's linear accelerators (linac), there is an extensive linac replacement programme underway. David Fenton outlined the EPA's risk-based approach to regulation which aims to ensure that the regulatory burden is proportionate to the risk arising from the decommissioning of accelerators that have operated above 10 MeV. Such use has given rise to induced radioactivity in the Linac head. Decay storage to background is the proposed EPA approach, though the period of storage is likely to depend on the composition of the Linac head. Therefore, the period of storage will need to be determined on a case-by-case basis. So far, a decay storage period to background, is estimated to be approximately 2 years which is manageable. However, difficulties could be foreseen if a longer storage period was deemed necessary.

The committee agreed that the proposed approach was acceptable and thought that this approach could be strengthened by seeking an international perspective. EPA could consider the following actions:

- present on this subject at an IAEA RASSC meeting as it is likely to be an emerging issue for other MS.
- Seek the views of other regulators e.g. UK EA
- Establish if IAEA have guidance on this.

- Include in the EPA guidance for authorisations. This could lever more information from suppliers.
- Consider if the EU Machinery Regulations or Medical devices regulations are applicable.

3. IAEA's 2026 Integrated Regulatory Review Service (IRRS) mission to Ireland

Veronica Smith updated the committee on the upcoming IAEA's IRRS mission to Ireland. She outlined the changes since the 2015 mission. Veronica, as IRRS Liaison Officer, outlined a proposed IRRS Oversight Committee and IRRS Project team structure and asked for advice or insights on how to prepare for the upcoming mission in 2026. The committee were in favour of the proposed project structure. Committee members recommended engaging in early communication across Irish stakeholder, having a collaborative approach, gap analysis, gathering reference documentation and training of all relevant stakeholders well in advance of the mission. It was noted that the mission is a positive opportunity to gain expert insights from international experts in the field.

4. EPA's role on Nuclear Safety

Kevin Kelleher briefed the Committee on the EPA's roles under International Conventions and how EPA is assisting relevant national stakeholders in developing their preparedness for an emergency. He detailed engagement with international bodies such as Heads of the European Radiological protection Competent Authorities, Nuclear Energy Agency and Western European Nuclear Regulator's Association and bilaterally with other national regulators. These engagements are critical to EPA's delivery of its functions and staff development. Views from the members were sought on the level of engagement and on any other opportunities to develop national expertise. The Committee agreed that the level of engagement and involvement as described is appropriate considering that Ireland is not a nuclear country. In relation to the issue of staff development, a suggestion was made to include staff in exercises and participation on relevant working groups.

Kevin outlined the current relevant research conducted by the EPA. This included research to inform public health messaging following a nuclear accident abroad and a baseline survey of the levels of radioactivity in the Irish Sea. One Committee member sought access to additional information on this research. The members were also asked for other topics that could be considered for research to assist the EPA in development of technical knowledge and relevant staff development in the area of nuclear safety.

There was a question from the Committee related to evaluations the EPA conducted in relation to nuclear safety in Ukraine and recent media coverage of the Sellafield site. Climate risks was also noted as an area for consideration. Kevin advised that EPA had engaged with HERCA and WENRA in relation to Ukraine and that EPA maintains contact with the Office of Nuclear Regulation and Environment Agency in relation to their regulation of Sellafield. He also advised that EPA has visited the site a number of times with representatives of the Department of the Environment, Climate and Communications. The Chair, in relation to Sellafield, advised that EPA continues to engage with UK counterparts and agreed to keep risks regarding climate change in relation to decommissioned sites under review.

There was a query related to the EPA's research conducted in the past in relation to [UK New Build](#) (2013) and [Sellafield](#) (2016) and the technical approaches taken. These are available in the reports (linked above). In addition, the Chair agreed that an ESRI report, on potential economic impact of a nuclear accident as an Irish case study which is in the public domain, would be re-circulated.

5. National Radon Control Strategy, Current Phase and Future Planning

Andy Fanning outlined that there is a national Radon Control Strategy whose coordination is led by the Department of the Environment, Climate and Communications. EPA is the implementation lead on a number of the actions under the strategy. Andy advised on the implementation work to date by the EPA under Strategy and briefed the committee on the EPA work ongoing. The Committee was asked if they had any suggestions on how to increase the uptake of radon testing and remediation and if there are any areas of opportunities other than areas being worked. The Committee emphasised that prevention of exposure to high radon levels is critically important to protect health. HSE clearly set out that radon prevention is significantly more effective at protecting health than testing and remediation. As the National Dose report is due to be published in the coming weeks, there was a suggestion that that could be used to increase awareness of the need for radon preventative actions. A committee member advised that a private school in their country was prosecuted for not having systems in place to ensure radon control measures were adequate. The Chair thanked the members for their suggestions and also welcomed a suggestion from Norwegian Radiation Protection Authority (DSA) that that a bilateral discussion would be useful between DSA and the EPA to share their national approaches to radon action.

6. AOB

At the request of a committee member, the Chair agreed to ensure that space will be given at designated meetings for horizon scanning and asked the Committee for suggestions on how to undertake same.

7. Close

The Chair closed the meeting and thanked the Committee for attending and for their valuable contributions.

8. Date of next meeting

It is proposed that the next meeting (virtual) of the Committee will be held November 2024.