

## **Minutes of the 3<sup>rd</sup> meeting of the Radiological Protection Advisory Committee**

**The 3<sup>rd</sup> meeting of the 2<sup>nd</sup> Radiological Protection Advisory Committee (RPAC) was held on Thursday 26<sup>th</sup> November 2020 via Microsoft Teams.**

**Members present:** Ciara McMahon (Chair), Wayne Anderson, Anthony Bexon, Andrew Bolas, Sean Curran, Paul Dorfman, Vivienne Duggan, John Harrison, Aidan Meade, Sheena Notley, Mary O'Mahony, Carol Robinson, Gareth Thomas, Stephen Thomas, John Tuffy, John Upton, Luis Leon Vintro

**In attendance:** Stephen Fennell, David Fenton, Stephanie Long, Collette O'Connor, David Pollard, Heather Ryan

**Apologies:** Luis Leon Vintro

**Scientific Secretary:** Alison Dowdall

### **1. Welcome and Introductions**

Ciara McMahon welcomed the members to the third meeting of the 2<sup>nd</sup> EPA Radiological Protection Advisory Committee (RPAC) and introduced herself as the new Chairperson of the committee following her recent appointment as Director of the Office of Radiation Protection and Environmental Monitoring. As part of this role, she advised that she will chair the newly formed Non-Ionising Radiation Protection Advisory Committee.

### **2. Minutes of last meeting and matters arising**

The minutes from the meeting held on 4<sup>th</sup> April 2019 were approved. With regard to items discussed at the previous meeting, it was noted that the national survey of the public's concerns about radiation was completed recently and a presentation on this work will be an agenda item at the next meeting. In terms of radon risk communication, the development and communication of the new radon risk map would also be an agenda item for a future meeting.

### **3. Update on development of next EPA Strategy**

Stephen Fennell gave a presentation on the development of the next EPA strategy. Stephen informed the committee that stakeholder consultation will take place in Q1 2021 and said that the process and timelines for this are to be agreed in December. There was some feedback commending the engagement of youth through Hub na nÓg. A committee member commented on the relevance of this engagement to other agencies and asked if a report would be available. It was noted that the reports will be written by a specialist writer who works with children and that it will be publicly available on the EPA's website.

#### **4. Adoption of the ICRP 137 dose conversion factors for radon**

A presentation on the use of the ICRP 137 dose coefficients for radon in workplaces was given by David Fenton. A discussion followed noting that while ICRP recommends two values, the higher value of 20 mSv per WLM is recommended where workers are engaged in substantial physical activities and for tourist caves and 10 mSv per WLM for buildings and mines. In October 2019, the IAEA Technical meeting recommended the use a single value of 10 mSv per working level month (WLM) as the default for workplaces unless a different dose conversion factor (DCF) is justified by specific aerosol characteristics. This recommendation was reiterated by the advice of the Inter Agency Committee on Radiation Safety. David Fenton said that this approach could be considered for show caves in Ireland.

It was noted that most EU MS use ICRP 137, the exception being Germany. The UK have not adopted the ICRP 137 values yet, however discussions are on-going. There was some discussion regarding the definition of Working Level Month used and the exposure calculations presented. David Fenton agreed there was minor errors in the calculations for the caves. While this did not change the overall trends presented but it would be corrected.

Sheena Notley enquired if a Regulatory Impact Assessment was required given the changes that arise if the ICRP 137 dose conversion factors are adopted. David replied that he did not know but agreed this ought to be considered. A committee member asked if consideration has been given to producing guidance for workers on retrospective doses received in workplaces. It was pointed out that an individual's risk from radon was largely dependent on tobacco exposure, using the dose alone was not sufficient to assess the individual's risk. There was another comment that risk communication will be required and David Fenton agreed that public information will be important.

A committee member enquired about the evidence for the new dose coefficients. John Harrison briefly reviewed ICRP's evidence that resulted in a revision of the dose coefficients.

#### **5. Development of IRR19 Code of Practice – Regulatory approach to selected issues**

David Pollard and Collette O'Connor gave a presentation setting out the development of the IRR19 Code of Practice. Following the presentation, a discussion was had on the increased involvement required by RPAs. Given that there is a shortage of RPAs, there was feedback from the committee that this could be an issue. David Pollard said that RPA involvement is commensurate with risk and acknowledged that this could be an issue for small practices. He said however that the proposed model aims to make the RPA requirements easier to comply with.

There was a query from one committee member asking if the RPA involvement is prescribed in the legislation and David Pollard replied that this is determined in the licence conditions. Another committee member welcomed the draft document and the opportunity to consult on it and said that while it addressed many issues for the practitioners, there are some areas that require further clarification, one being the interpretation of doses liable to be received. A discussion was had regarding exposed workers sharing records with an undertaking. David Pollard said that once the Code of Practice was in place, the next step would be to deliver the National Dose Register. A

committee member pointed out that there may be issues where workers from outside Ireland have radiation passbooks. Collette O'Connor said that EU radiation passbooks would be looked into next year. She also pointed out that the system does not discourage monitoring for worker reassurance.

Another committee member noted that no reference levels had been included in the Code of Practice. He also commented on undertakings required to consult or seek advice from an RPA, suggesting that these 2 terms may be confusing. David Pollard said that these could be very different and in the case of low risk practices could be very straightforward. The committee member also referred to the classification of workplaces without controls and pointed out that there will always be controls in place. He also had queries regarding outside workers and sharing of records.

## **6. Review of the EPA approval model for Radiation Protection Advisers**

There was feedback from committee members again noting the increased involvement of RPAs who are in short supply. Gareth Thomas had comments on the paper and offered to discuss them in detail at a later date. He welcomed the new streamlined approval forms and he also welcomed removal of barriers to entry. He said that one of the barriers may be that the patient protection regulations are not risk based. He added that instead of considering this as a regulatory requirement that can't be enforced, another approach may be to enforce it and create a market encouraging more physicists to become involved. There was a comment that the model may undermine rather than advance graded authorisation and may lead to a situation of self-regulation in some sectors. Collette O'Connor said that it is envisaged that the main cohort of Level 1 RPAs will come for junior physicists and not from the dental sector.

John Upton added by removing barriers, more of the Medical Physics Experts on the ICPM register may be in a position to train for Level 1 RPA. He welcomed the two-level approach setting out practices under each level. He said that there may be issues with the criteria for educational qualifications required. Heather Ryan said that the requirements set out in the paper are in line with those identified by the Heads of European Regulatory Competent Authorities (HERCA). Another committee member agreed that international guidance show that there is no justification in limiting the qualifications required to specific disciplines.

Committee members also raised issues for dentists of overburden due to the requirements for low risk practices in regard to MPE and RPA. There was a suggestion that a combined approach from HIQA, EPA and ICPM could be considered.

A committee member asked if the discussion papers from this meeting could be circulated and David Pollard said that once feedback from this meeting has been considered, stakeholder consultation would take place.

## **7. A.O.B**

With regard to agenda items for future meetings, the chair welcomed relevant emerging issues from the committee.

## **8. Date of next meeting**

It was agreed that the next meeting would take place in April 2021 and a date will be circulated.