

EU Basic Safety Standards Directive: Some Probable Implications

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Implementation date

- Government policy is not to implement European Directives early or late
 - Implementation early Feb 2018
- However:
 - Dose limits are annual
 - ADSs work in calendar years
 - Implementation part way through a year is expensive
- New or some aspects of IRR18 may come into force on 1st January 2018 - discussions taking place

HSE Graded Approach

- Notification
- Registration
- Licensing
-of a practice
 - Practice means a human activity that can increase the exposure of individuals to radiation from a radiation source and is managed as a planned exposure situation;

HSE Notification

- Small quantities of radioactive material
- Radon
- NORM
- Likely simple system
- Digital/Electronic
 - Who, what, where
- No transitional arrangements allowed
 - Practices will have to notify by early 2018

HSE Registration

- the operation of radiation generators or accelerators or radioactive sources for medical exposures or for non-medical imaging purposes
- the operation of radiation generators or accelerators, except electron microscopes, or radioactive sources for purposes not covered by point (a).

HSE Registration

- Likely to be digital/electronic with small fee
- No transitional arrangements allowed
 - Practices will have to be registered by early 2018

HSE Registration



- Likely to be limited to confirmation that various things have been done in compliance with the IRR18

HSE Licensing



- the deliberate administration of radioactive substances to persons and, in so far as the radiation protection of human beings is concerned, animals for the purpose of medical or veterinary diagnosis, treatment or research
- the deliberate addition of radioactive substances in the production or manufacture of consumer products or other products, including medicinal products, and the import of such products

HSE Licensing



- any practice involving a high-activity sealed source;
- Some other possible options available from BSSD are under discussion

HSE Licensing

- Likely to be digital/electronic with fee
- Processes under development
 - Licence conditions
 - Declaration? Submission of information? Assessment?
 - Options for joint licensing with OGDs?
- No transitional arrangements
 - Practices will have to be licensed by early 2018

New Eye Dose Limit

- From 150mSv to 20mSv per annum
- Recent research (PHE, NHS Trust) indicates most will be able to achieve this
 - Provision of adequate shielding and PPE
- Probable increase in the number of classified persons
- Greater demand for personal eye dosimeters

Significant events

- BSS requires recording and analysis of significant events
- Significant events not defined
- HSE will define significant event as the use of contingency plans (as required by Reg 12 of IRR99)
- Reporting arrangements to HSE will remain the same.

Other Notable Issues

- Definitions
 - Some new to BSSD
 - Some differ from IRR
 - Analysis continues

Other Notable Issues

- Radon
 - Reference level changes from 400Bqm⁻³ over 24 hour period to 300 Bqm⁻³ annual average
 - Approximately equivalent
- GB will need Radon National Action Plan
 - PHE lead
- Notification prior or post remediation?

Stakeholder involvement

- Operational Exposures Working Group (HSE) and sub-groups
 - Eye Dose sub-group 8th July 2016
- Medical Exposures Working Group (DoH)
- Public Exposures Working Group (DECC)
- HSE Community of Interest
 - <http://webcommunities.hse.gov.uk/connect.ti/radiationcom/grouphome>
- Formal Consultation from January 2017