ISSPA Experience with the Code of Conduct on the Safety and Security of Radioactive Sources

Manufacturers’ Perspective on the Movement of Sealed Sources

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Outline

• ISSPA overview
• Peaceful, beneficial use of sources
• Code of conduct
• Import/export of sources
  – S/N requirements
  – Inconsistent licenses
• Management of sources
The International Source Suppliers and Producers Association (ISSPA) is an association that is comprised of companies who are international industry leaders in the manufacture, production and supply of sealed radioactive sources and/or equipment that contains sealed radioactive sources as an integral component of the radiation processing or treatment system, device, gauge or camera.

WWW.ISSPA.COM
ISSPA’s Objectives

• Primary objective is to promote the beneficial use of radioactive sources

• Strive for continuous improvements in the safe and secure use, transportation and end of life management of sealed sources, and we maintain a strict code amongst members regarding quality, safety and security

• Provide industry leadership and technical expertise in the development and implementation of regulations and guidelines in regards to the safe and secure design, manufacture, use and supply of radioactive sources
17 Members

- Alpha Omega Services
- Berthold Technologies GmbH & Co. KG
- Best Theratronics Ltd
- Dioxitek S.A./CNEA
- Eckert & Ziegler Nuclitec GmbH
- Endress + Hauser GmbH + Co. KG
- Gamma-Service Recycling GmbH
- Hopewell Designs

- Institute of Isotopes, Co. Ltd.
- International Isotopes Inc.
- Nordion Inc.
- NTP Radioisotopes
- QSA Global Inc
- RAIMS
- Source Production & Equipment
- Studsvik
- Varian Brachytherapy
Beneficial Uses

Must never forget – sealed sources are vital to many aspects of our lives, whether we see it or not.
The use of sources has a huge and very positive impact on society
Shipment of Class 7 is Normal

- Across our members, there are tens of thousands of shipments a year of sealed sources
- Even for Cat 1 and Cat 2, thousands of shipments annually
- How to ensure safety and security without implementing a cumbersome framework
• Overall experience of implementation across member states has been positive
  • Provides consistency of regulations
  • Provides a framework for movement of sources that, at a high level, makes sense

• Good understanding of process with major regulators.
What Industry Needs

- Harmonized regulations
  - At least consistent regulations
- Clarity in licenses
  - Should state what they mean – no assuming
  - Not be overly prescriptive
- Responsive regulators
  - Need to engage and work with all regulators
What Industry Provides

• Depth of Knowledge
  • Shipment of sources worldwide
  • Practicality of initiatives.
  • Historical information

• Openness to look at security improvements
  • Need to be consistent with risk

• Means for end-of-life management of DSRS

It is industry’s best interests that everything goes well
Industry Concerns

• Overly prescriptive or restrictive regulations
  • Don’t recognize just how often Cat 1/2 ship
  • Inconsistent regulations
  • Overly prescriptive information
    • Source S/N, package TI needed for import licenses

• Denial of Shipments
  • Often solved with better dialogue between port/carriers and consignors
Use of Import Licenses

- Use of import permits is varied
  - May be part of possession license
  - May be generally authorized if user has possession license
  - May require stand-alone import authorization for each shipment

- Import and Possession Licenses not always straightforward
  - Max activity vs nominal
  - Locations of use vs radiation safety administrative office.
  - Variations in end-user names between documents received.
  - Some licenses don’t change until after new sources are provided. Site license lists current source and activities. but seem to prescribe what is allowed.
  - Allow for “double sources” on site during exchange?
What is the role of Pre-Shipment Notifications?
- How do regulators use this information?
- Should provide additional details of shipment (i.e. S/N, routes, etc)

What is the role of Request for Consent (RfC)?
- Does this supersede import permits?
- Does this mean the regulator has no concerns with the import?
- Does the department performing RfC consult user licenses?
- Industry takes this to mean the importing regulator has verified the end-user is able to accept the sources (has licenses, appropriate security, etc).
Prescriptive Returns

• Requirements for source returns sometimes come with prescriptive requirements
  • End-user export license might specify disposal
  • End-user undertakings won’t allow for reexport – forcing source returns into the general export framework.
  • End-users require a disposal certificate once sources are returned.

• Reuse and recycling are viable end-of-life management options – but may not be known at time of return.

• Return approvals should consider only transfer to an authorized, licensed user and not prescribe usage.
Conclusions

• The Code and associated Guidance documents provide a framework for the safe and secure movement and use of sources

• It is not meant to inhibit or deny such shipments

• An internationally consistent implementation of the Code and associated Guidance documents are vital for success
Questions?