IAEA NATIONAL DOSE REGISTER EXPERT MISSION #3

STEERING COMMITTEE MEETINGS

1-5 DECEMBER 2014, NNR OFFICES, CENTURION

Participants

Mr A Muller (NNR)
Mr M Souphy (FANC)
Mr S Pheto (NNR)
Mr M Vermeijs (AngloGold Ashanti)
Ms G Dladla (NNR)
Mr T Segacwi (NNR)
Mr P Mohajane (NNR)
Mr E Phale (SABS)
Mr E Smit (Radcon)
Mr D Venter (Harmony Gold)
Mr Z Zituta (Sibanye Gold)
Mr M Strauss (Parc RGM)
Ms N Mohlala (NNR)
Mr J le Roux (Necsa)
Mr J Boulton (NNR)
Mr O Phillips (NNR)

Apologies

M M Maree (Eskom)

1. Welcome and Purpose

Mr Phillips welcomed the participants to the meeting. He stated that the National Dose Register (NDR) project was a key regulatory project, and that the establishment of the NDR will ensure a centralised and well maintained sustainable occupational dose records system.

2. Review of Pilot Study 1

The Pilot Study 1 involved the Data Providers serving on the NDR Steering Committee, and was conducted for 6 months until the end of October 2014. The upload process, number of files submitted and the content of the uploaded files were reviewed. Some organisations uploaded all files in the correct format, a few organisations entered some of the files in the right format and one organisation had challenges uploading any file. It was agreed that the organisations that encountered problems with the upload should liaise with the NNR or IAEA Expert, and re-upload corrected files to the NDR during the first few months of 2015.

Data Providers

3. Data Transfer Template for 2nd Pilot

The review comments from Sibanye, Harmony, and Necsa were addressed. The Committee agreed that only the Effective Dose field should be compulsory, and that the other existing dose related fields should be optional and included in a separate worksheet. Effective Dose should be moved next to Begin and End dates.

Summation for the purposes of creating different report types should be done in the NDR. Originator type should be replaced by Template version, and Necsa and Vaalputs should be added with NL for Companies Identifiers removed. The User's Manual should explain the priority identification order.

The mandatory Exposure Type options should include External, Internal and Effective Dose. Dosimeter Type should be captured in a separate sheet which should be explained in the User's Manual. TLD and gravimetric sampling should be added to the existing four types. The Individual and Workplace fields should be removed from the template. Corrections should be added in Dose Status (also to be renamed), and First Name (to be made optional) should be replaced with Initials (Mandatory). The CIRPO companies list should be added to the Practice list and should be included in the NDR Web Portal.

It was agreed that the template should be finalised before end January 2015. No template changes should be made after April 2015, but should be considered after one year of the Roll-Out of the NDR.

M Souphy

4. NDR User's Manual

It was indicated that the User's Manual should be converted to an NNR document format in the Interim, and that it could become part of a Regulatory guide in future. The User's Manual should be included on the NDR Web Portal as a link, and more screenshots of the template and NDR should be added.
It was agreed that lessons and comments from Pilot Studies should be included in the Manual and that it should be updated after each project milestone. It was reported that the Data Providers will not access the NDR within RAIS, but will be limited to the NDR Web Portal for dose data upload, access to dose records and reports.

An Appendix should be prepared for the User's Manual distinguishing what type of data is to be uploaded by the different categories of Data Providers. The User's Manual should specify that extremity doses should only be provided by Data Providers or authorisation holders as specified in the authorisation conditions, and optional for all other users. It was agreed that the Template should be finalised before end January 2015.

M Souphy/NNR

5. Other NORM Data Providers

It was reported that a workshop was conducted with about 15 additional NORM Data Providers that responded to the NNR letter requesting Dose Register information and inviting them to participate in the NDR. The training that could not be undertaken due to unforeseen circumstances on 3 December 2014 will be re-scheduled for April 2015. It was agreed by the NDR Steering Committee that a Pilot Study to test the design and the upload of monthly occupational radiation doses should be conducted over a period of three months, starting at the end of April 2015 specifically for NORM authorisation holders that attended the meeting. Prior to the Pilot Study, the NDR template and User's Manual should be provided to NORM holders to practice the data upload and filling of the template for a period of two months. The NNR needs to provide all participating organisations with the necessary passwords and information for this Study, and all uploaded data will be treated as confidential.

NNR

The NORM holders need to be requested to indicate a willingness to participate in the NDR Project, and to nominate two persons (main and an alternate) to participate in the Pilot Study. Any costs relating to compatibility of Data Providers Dose Register and attendance of NDR related activities should be borne by NORM Data Providers.

NORM Data Providers

A meeting between the NNR and the NORM Data Providers needs to be arranged for April 2015 where issues such as the data upload frequencies, changes in Mine ownership, period of historical data to be uploaded, current system of dose reporting, and types of doses to be uploaded by NORM will be agreed.

NNR

6. NDR Legal Basis

Mr le Roux presented a Legal Opinion on the NDR, which included a review of existing legislation (NNR, PAIA, Health Act) and regulatory requirements. His study concluded that the legal basis for the establishment of a National Dose Register is not clearly defined in legislation, that Data Providers are currently not legally bound to submit dose records to the National Dose Register, that for data upload, consent should be obtained from the radiation workers and that requirements for Dosimetry Service Providers are not clearly defined.

The NNR provided some information related to the NDR from the new proposed draft regulations and indicated that authorisation holders will be provided an opportunity to review and make input to the draft regulations. The Roll-out of the NDR could be facilitated by means of regulatory directives, or through additional conditions in the authorisations. It was stated that Gazetting of the NDR should be considered, describing the NDR, clarifying regulatory requirements, confidentiality and consent issues and responsibilities of all stakeholders. It was agreed that the NNR should review the legal opinion, and compile a report on how the NDR would be addressed in the NNRA Amendments, Regulations, and Regulatory Guides etc. The NNR report should be provided to the Steering Committee for review.

NNR

7. Information and Communication Technology (ICT)

It was stated that the ICT infrastructure would be able to accommodate the NDR in the short-term, but that as the volumes and Data Providers increase, necessary upgrades to the system should be considered. A security penetration test was performed on the server/system, and actions implemented pertaining to the security of the NDR. It was agreed that an ICT strategy/plan should be prepared by May 2015 relating to the configuration and installation of the Final NDR Server, backing and archiving up of Dose Data, capacity to store all historical data, information security, scalability, reports and checks to ensure accuracy of data, and RAIS/SQL training.

NNR

8. Final NDR – Upload of Data

It was indicated that one Master account will be assigned per Data Provider to upload data. The Master account will create sub-accounts and allocate sub-account rights. Data Providers would be responsible for the accuracy of uploaded data, consent from workers and confidentiality aspects through its internal policies. Data should be uploaded to the NDR in line with authorisation conditions, once approved internally at Data Providers. Monthly uploads may be allowed by some Data Providers preferring this frequency. The SABS should not upload any dose data from NNR holders.

Data Providers

An automatic reminder to upload data (at COR frequencies) needs to be included in the NDR process. The NNR NDR Administrator should be notified once a new file is uploaded. NDR Logos should be added on the Web Portal.

M Souphy

9. Final NDR – Access to Dose Records

It was agreed that the aim was for the NDR to be as automated as possible, with access restricted as far as practicable. The Master account holder at each Data Provider should provide rights to sub-accounts to access dose data and reports in the NDR. Dose tracking will be in the form of monthly or quarterly outputs, acknowledging that for the last 3 months no doses will be recorded, and the employee will have to be consulted in this regard.

The User's Manual should specify the process to access information in the NDR. A functionality should be added to the system whereby the NDR would be able to email reports to past holders. Tick boxes should be used in the NDR for consent by employees, and signed consent forms kept in medical files. For any accessing of dose data by Data Provider account holders, an auditable trail or report should be available in the NDR.

M Souphy

The Data Providers would be able to access all workers effective doses, for whom they have consent form, but would have access to other companies data. The consent would be valid for all Data Providers accounts indefinitely, and will be consent for the lifetime of the worker.

Data Providers

10. Final NDR – Historical Data

It was stated that the NNR and NORM Data Providers would agree on the Historical Data Upload period during the meeting in April 2015. NNR holders are to upload all historical dose data (including doses relating to radioactive sources regulated by Radcon). SABS is to upload all DOH staff and holders data not regulated by the NNR, as well as uploading NNR staff dose data. It was acknowledged that the NDR will be able to provide lifetime doses for some workers, and total doses for others, where all historical data is not available.

NNR, SABS

It was agreed that all historical doses should be prepared by end May 2015 and that it could be uploaded during the next IAEA NDR Expert Mission. This upload would be dependent on the number of issues/challenges to be encountered relating to this process.

Data Providers

11. Final NDR – Report Types

It was indicated that templates and logos should be inserted in the NDR for all report types. It was agreed that Data Providers Reports in the NDR should include Effective Dose for all periods, a Calendar Year, and Year to Date Effective Dose, as well as a 5-year block Effective Dose.

M Souphy

It was reported that the UNSCEAR reports included Average Annual Effective Dose, Annual Collective Effective Dose, Collective dose at different levels, and the number of workers exposed at different dose levels. It was agreed that a decision on the Regulatory reports to be generated by the NDR should be taken by February 2015.

NNR, Radcon

13. Proposed Way Forward

Mr A Muller presented a summary of the proposed way forward, which was accepted by the Steering Committee. The activities below will be included in the new NDR Project Plan.

December 14	Provide Summary and Way Forward to NORM
January 15	Provide Letters, Upload Template, User's Manual to NORM
February 15	Receive Response from NORM Provide Portal Info and Accounts NORM practice Data Upload Legal Report provided by NNR Regulators Agree on Regulatory Report Types
March 15	NORM Practice Data Upload Final 2015/6 NDR Project Plan
April 15	NNR Meeting with NORM, Steering Committee meeting NORM Training Finalisation of template (for 1y) for Roll-Out NORM Pilot kick-off for 3 months
May 15	Pilot NORM NNR ICT report Historical Data Preparation
June 15	Pilot NORM Historical Data Preparation and Submittal to NNR
July 15	IAEA NDR Mission #4 Steering Committee meeting, Finalisation of Directives COR changes, upload of Historical Data
August 15	Planned Roll-out of NDR

14. Date of Next Meeting

Steering Committee meeting, April 2015, NNR Offices, Centurion.

IAEA NDR Expert Mission #4, Cape Town, end of July 2015, (venue to be confirmed).

15. Closure

The chairperson closed the meeting and thanked all participants for their inputs and contributions to the meeting.