Dose reporting, Dose record keeping and information systems

Basis for procedures and criteria for mutual recognition of approved dosimetry services in Europe

(Chapters 9 and 11 of RP 160)

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Chapter 9. Dose reporting, Dose record keeping and information systems

RP 160 - Recommendations

1. Approval procedures for dosimetry services in relation to dose reporting should:
   a) state the dose information needed, e.g. dose in meas period, annual and/or 5-year accum dose;
   b) state detection limits of the dosimetry system;
   c) detail background subtraction methods;
   d) state the destination of the dose report;
   e) give details on storage of monitoring records and reported dose values;
   f) state monitoring and reporting periods.

2. Every MS should create and maintain a national dose register (NDR) where the dose values received by workers (as a minimum those in Category A) monitored in the country are kept for time intervals longer than the worker’s working life and the life-time of the undertaking. In conformity with ISO/IEC 17025, all reported doses should be stored for an appropriate period.
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3. The NDR should:
   a) store of dose values reported by an ADS or by an undertaking, e.g. aircraft crew;
   b) perform statistical analysis of data to characterize occupational exposure in the country;
   c) define work activities (for example, nuclear, medicine, industry, or natural);
   d) regularly publish occupational exposure reports;
   e) provide and/or issue radiation passbooks.

4. Requirements on security of dose records:
   a) DB with personal classified information should be registered;
   b) access to premises, files, archives, computers, servers, etc where personal information is handled and stored should be restricted;
   c) access to the classified information should be allowed only for radiation protection purposes;
   d) circulating information, particularly when using IT networks should be secure;
   e) there should be back-up procedures and equivalent security for copies;
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9.4.6 National Dose Register

- Part of the RP authorities

- Responsible for the collection and maintenance of dose records provided by the ADS and in some cases, by undertakings.

- The information stored should allow the follow up of the doses received by a person during his working life and a time interval after the termination of work.
9.4.6 National Dose Register

- Long-term storage of dose records at a NDR is a way to prevent the loss of individual dose data in case the undertaking ceased its activities in the country.

- Should perform regular analyses of the dose data collected in order to characterize national occupational exposure and

- *Quantities stored at the NDR* - the effective dose $E$ must be recorded in order to be compared to the (annual) dose limit. $E$ will refer to all possible exposure pathways, that is $E = E_{\text{ext}} + E_{\text{int}}$. For external dose assessment $H_p(10)$ is normally stored as the surrogate for $E$. 
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- **Aircraft crew** – No specific recommendations,
  Assessments provided by computer codes, and should be validated [EC 2004].

- **Emergency dosimetry** – Not covered in the TR,
  Where dose assessments have been made the assessed value of dose along with the personal data should be entered in the NDR following the event. **Provision should be made to identify these special circumstances.**
Outside workers and radiation passbook – MS must ensure outside workers are afforded the same level of protection as that of workers employed on a permanent basis [EU 1990, OWD]

A radiation passbook should be issued which includes: the identification of the outside worker and detailed information before and after the start of any activity, for example, medical classification of the worker and results of the worker’s individual exposure monitoring. For practical reasons the radiation passbook should be in English and the MS language.

Notional doses – “Administrative dose” may have been added to the dose record prior to it being sent to the NDR. In some MS this is a task of the NDR.
BSS 2013/59/EURATOM

96/29/Euratom  BSS Workers and members of public
97/43/Euratom  Medical exposures
89/618/Euratom  Radiological Emergencies
90/641/Euratom  Outside workers
2003/122/Euratom  HASRS and Orphan Sources
90/143/Euratom  Recomm on indoor exp to Radon

Art 43 Recording and reporting results

1. MS shall ensure that a record containing the results of IM is made for each category A worker and for each category B worker where such monitoring is required by the MS.
2. (…)
   (a) A record of exposures measured or estimated, as the case may be, of individual doses pursuant to Articles 41 Individual Monitoring, 42 Dose assessment in the case of accidental exp, 51 Protection of outside workers, 52 Specially authorized exp, 53 Emergency occ exp, and if decided by the MS pursuant to Article 35(2) Radon exp, 54(3) Radon in workplaces
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9.7 NDR Links to other data sources and databases

- NDR may periodically share information with international organizations concerned with the characterization of occupational exposure such as ISOE, ESOREX and UNSCEAR.

- The sharing of dose results to perform occupational exposure studies reveals the need for harmonized procedures for reporting and storing dose data:

  Different dose measurement methods: entail background dose subtraction methods, detection limits versus recording levels.

  The use of notional doses (a dose value on a record but doesn’t correspond to an actual dose received), should also be avoided.
Further steps for Harmonization

ESOREX-Platform: European Platform for Occupational Radiation Exposures
ESOREX
European Study on Occupational Radiation Exposures

Attempt to create a EU data base
End 1990s ESOREX East
ESOREX West
2004 ESOREX E+W
(…)
2010 ESOREX 2d Symposium
Need to “survive” no funds from EU

EU opened call for a tender:
IRSN + (BfS, SL, GR, EI, CH)

ESOREX-Platform:
European Platform for Occupational Radiation Exposures

(A. Rannou presentation at IAEA Dec.2014)
Basis for procedures and criteria for mutual recognition of approved dosimetry services in Europe

(Chapter 11 of RP 160)

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Chapter 11. Basis for procedures and criteria for mutual recognition of ADS in Europe

- Table with general (minimum) and additional criteria for:
  - satisfactory dosimetric characteristics
  - traceability
  - quality management system
  - accuracy of measurement of the personal dose equivalents
  - performance test for approval
  - periodic performance test
  - intercomparisons
  - internal audit
  - external audit
  - inspection
  - annual confirmation by the service

- Importance of harmonized approval procedures
Although EU Directives must be implemented into national law,

Member States are free:
- how directives are transposed
- establishing their radiation protection infrastructure (including approving bodies)
- differences in legal systems, can result in differences in approval procedures.

Member States may require that undertaking
- operates under its laws
- must use an ADS that is covered by its legislation,
  - that meets the specific approval requirements
  - that are administered by its approval authority.

Although in each MS: ADS may have different relationships with governmental bodies
- approval authority,
- the national dose registry,
- accreditation body.  
  Wide agreement (MS) is needed
EU specifically asked (conditions of the tender that were met)...

- RP 160 should be a wide *consensus* document

- RP 160 should contain Basis for *procedures and criteria* for mutual recognition of ADS in Europe

- RP 160 should be *approved* by the Group of Experts established under the Article 31 of EURATOM Treaty
Chapter 11. Basis for procedures and criteria for mutual recognition of ADS in Europe
If met, would be a significant step towards this goal.

Table 11.1: General criteria (Chapter 8) and additional criteria for approval

<table>
<thead>
<tr>
<th>Issue to be demonstrated</th>
<th>General (minimum) criteria (Chapter 8)</th>
<th>Additional criteria (attainable in a reasonable time frame)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Satisfactory/suitable dosimetric characteristics</td>
<td>Type test against current international standard(s), including software. All data, including the rated ranges for each input quantity, graphs, combined standard uncertainty reported together with the laboratory at which the test has been performed</td>
<td>Type test to demonstrate full conformity, including software, with current international standard(s), or with European Council and Parliament requirements if these are introduced. All data, including the rated ranges for each input quantity, graphs, combined standard uncertainty reported together with the laboratory at which the test has been performed</td>
</tr>
<tr>
<td>Traceability</td>
<td>To a NMI or secondary standard laboratory</td>
<td></td>
</tr>
<tr>
<td>Quality management system</td>
<td>In accordance with EN/ISO/IEC 17025</td>
<td>Accredited according to EN/ISO/IEC 17025</td>
</tr>
</tbody>
</table>
### Table 11.1: General criteria (Chapter 8) and additional criteria for approval

| Issue to be demonstrated                                      | General (minimum) criteria (Chapter 8)                                                                                                                                                                                                 | Additional criteria (attainable in a reasonable time frame)                                                                 |
|-----------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Accuracy of measurement of personal dose equivalents            | Combined standard uncertainty for measurement of personal dose equivalents at the location of the dosemeter for photons and electrons of ± 30% for doses greater than 1 mSv for $H_p(10)$ and 50 mSv for $H_p(0.07)$, and ± 20% or factor of 1.5 at 95% confidence, for doses equal to dose limits, in both cases pro rata for wear period. Combined standard uncertainty for measurement of personal dose equivalents for neutrons of ± 50% for doses greater than 1 mSv for $H_p(10)$ and 50 mSv for $H_p(0.07)$ (using dosemeters calibrated in terms of $H_p(10)$), pro rata for wear period. |                                                                                                                                 |
| Performance test for approval                                  | ‘Announced test’ (see Chapter 8) with the satisfactory response of the dosimetry system within the rated ranges of all input quantities.                                                                                                                                                        | ‘Surprise test’ (see Chapter 8) with the satisfactory response of the dosimetry system within the rated ranges of all input quantities.                                                     |
| Periodic performance test                                      | For a small number of dosemeters for each of several irradiation conditions every 3 years                                                                                                                                                                                                  |                                                                                                                                 |
| Intercomparisons                                                | Take part in national, European and international intercomparisons                                                                                                                                                                                                                         |                                                                                                                                 |
| Internal audit                                                  | Every year                                                                                                                                                                                                                                                                             |                                                                                                                                 |
| External audit                                                  | Audit by approval authority condition for approval                                                                                                                                                                                                                                        | Audit according to accreditation requirements.                                                                                                                                 |
| Inspection                                                      | Condition for approval + repeated at least every 3 years                                                                                                                                                                                                                                 | Condition for approval + repeated on a ‘surprise’ basis                                                                                                                                 |
| Annual confirmation by the service                              | Annual declaration that everything is in accordance with approval requirements and annual report on operations                                                                                                                                                                               |                                                                                                                                 |
RP160: What does it offer?

- based on the relevant legislation and standards in force
- compilation of documents
- basic knowledge for the IM and metrology community
- specific and clear technical advices and guide lines
- filled the gap between RP73 and ICRP publications
- basis for harmonization
- basis for mutual recognition
- consensus and acceptance from the scientific community
Harmonization through the implementation of standards could be achieved if the competent authority or another legal body of Member State set out requirements for approval based on international standards and/or international recommendations.

In the EU, national accreditation bodies sign the Mutual Recognition Agreement. This would imply that an ADS accredited in one of these countries would also be accredited in any other signing countries. This is not the case for approval.

It is recommended that for approval individual monitoring services should follow the recommendations on accuracy, type-testing, dose record keeping and reliability given in these Technical Recommendations.

Thank you for your attention!