

Additional matters to be addressed in security plans and transport security plans

Security of high consequence radioactive material

Section 16A of *Subordinate Legislation Act 1994*
Section 67C (1)(c) and (d) and (2) of *Radiation Act 2005*

Background

Security plans

Section 67B of the *Radiation Act 2005* requires that the following persons must prepare and submit a security plan to an approved assessor for approval:

- a) An applicant for a management licence who intends to possess a high consequence sealed source or high consequence group of sealed sources;
- b) An applicant for a facility construction licence who intends to construct or use land for a building as a radiation facility that will house a high consequence sealed source or high consequence group of sealed sources;
- c) A management licence holder who intends to make an application to vary their management licence in order to possess a high consequence sealed source or high consequence group of sealed sources.

Section 67C of the Act requires that a security plan prepared and submitted under section 67B must –

- a) Address the security standard specified by the secretary under section 67N for the high consequence sealed source or high consequence group of sealed sources; in relation to which the applicant for, or holder of, a management licence will conduct a radiation practice; and
- b) Set out the security measures to be implemented to control any issues identified in the security standard; and
- c) **Include any other matters specified by the Secretary in accordance with subsection (2);** and
- d) Be in the form specified by the Secretary.

Section 67C(2) of the Act states that the Secretary to the Department of Health and Human Services may, by notice published in the Government Gazette, specify any additional matters that must be addressed in the security plan.

Transport security plans

Section 67G of the *Radiation Act 2005* requires that a management licence holder who is licensed to transport a high consequence sealed source or high consequence group of sealed sources must prepare and submit to an approved assessor for approval a transport security plan each time the licence holder proposes to transport a high consequence sealed source or high consequence group of sealed sources.

In the case of a proposal to transport similar category 2 sealed sources or category 3 sealed sources, or a category 2 group of sealed sources or category 3 group of sealed sources, using a series of shipments, a single transport security plan may be prepared if the plan includes details for each shipment.

Section 67H of the Act requires that a transport security plan must –

- a) Address the security standard specified by the secretary under section 67N for the high consequence sealed sources or high consequence groups of sealed sources proposed to be transported; and
- b) Set out the security measures to be implemented to control any issues identified in the security standard; and
- c) **Include any other matters specified by the Secretary in accordance with subsection (2);** and
- d) Be in the form specified by the Secretary.

Section 67H(2) of the Act states that the Secretary to the Department of Health and Human Services may, by notice published in the Government Gazette, specify any additional matters that must be addressed in the transport security plan.

Purpose of this document

The purpose of this document is to specify the additional matters that must be addressed in a security plan and a transport security plan.

Security plans

The security plan must include the following:

- (a) Where a management licence exists authorising the possession of high consequence sealed sources or a high consequence group of sealed sources, the:
 - i. Department of Health and Human Services licence number;
 - ii. Department of Health and Human Services authorisation number for each sealed source or sealed source apparatus;
- (b) A description of each sealed source or sealed source apparatus including:
 - i. Radionuclide(s);
 - ii. Maximum permitted activity;
 - iii. Serial number of the sealed source(s);
 - iv. Serial number of the sealed source apparatus container (where there is one);
 - v. Security categorisation using the prescribed methodology;
- (c) A copy of the current management licence;
- (d) Address of the site or sites at which a source is or is to be located;
- (e) Description of the specific location of the source within the site in which it is located;
- (f) Plan of the building or facility including the physical security measures used to protect the source and a definition of the 'secure area';
- (g) Allocation of responsibilities to persons for security;
- (h) Description of the specific security concerns that have been identified to be addressed (e.g. theft or sabotage, or mechanical or electronic failure of a physical security measure);
- (i) Description of the physical security measures that will be used to address the security concerns;
- (j) Description of the procedural security measures that will be used to address the security concerns including:
 - i. Access control;
 - ii. Key control;
 - iii. CCTV surveillance;
 - iv. Personal surveillance;
 - v. Identity verification;
 - vi. Inventories & records related to the management of sources;
 - vii. Information security;
 - viii. Procedures to be followed before, during and after a technical service;
 - ix. Contingency & security response arrangements including notification of a security breach;
 - x. Confirmation of what period of time a source may be not in transport, use or storage;
 - xi. Security education & awareness;
 - xii. Actions to be taken in the event of a change in threat level;
- (k) Arrangements for review and revision of the plan including a maximum time between reviews.

Transport security plans

The transport security plan must include the following:

- (a) A description of the source or sources including:
 - a. Department of Health and Human Services licence number (if any);
 - b. Department of Health and Human Services authorisation numbers for the sources (if any);
 - c. Radionuclide(s);
 - d. Activity (including date of measurement);
 - e. Serial number of the sealed source(s);
 - f. Serial number of the source container (where there is one);
 - g. Security categorisation using the prescribed methodology;
- (b) Statement of the purpose or reason for which the high consequence sealed sources or high consequence group of sealed sources is being transported;
- (c) Description of the conveyance and the arrangements for securing the shipment during trans-shipment or other stops on route;
- (d) Allocation of responsibilities to persons for security;
- (e) The name, address and business and after hours contact details for the consignor, consignee, carrier and, where used, security guard or police service;
- (f) Description of the specific security concerns that have been identified to be addressed e.g. theft or sabotage, or mechanical or electronic failure of a physical security measure;
- (g) Description of the physical security measures that will be used to address the security concerns;
- (h) Description of the procedural security measures that will be used to address the security concerns including:
 - a. Arrangements for notifying, as deemed appropriate, local police service or the regulatory authority of each jurisdiction in which the source will be transported;
 - b. Contingency or emergency procedures for vehicle accidents or breakdown and including, for Category 1 sources, a planned principal route and an alternative route;
 - c. Security response arrangements including notification of security breach;
 - d. Security briefing for persons involved in transporting the source including nature of the threat, threat level and contingency and security response arrangements;
 - e. Identity verification;
 - f. Information security;
 - g. Means of communication between parties involved in transporting the source;
 - h. Actions to be taken in the event of a change in threat level;
- (i) The period for which the plan applies;
- (j) Arrangements for review and revision of the plan including a maximum time between reviews.