Department of Health



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RPO Competence and Training

Interim Position Document

NOTE:

- Any reference in this document to a radiation protection officer (RPO) shall apply equally to the acting RPO (ARPO), since the ARPO must be able to stand in for the RPO and carry the same responsibility (regulation 6 (5) (b) of R247¹).
- This is an interim document pending the revision and expansion of the existing RPO Guidelines in the light of reviews of legislation and guidance documents.

A. Legislative requirements

According to regulations 6 (1), (2) and (5) of R247¹, the RPO must be permanently employed by the authority holder. Apart from any other powers or duties associated with the post held by the RPO, the authority holder shall place this person in control of all activities related to the radionuclide authority, and of all actions and operations performed in terms of such authority by any radiation worker or other employee of such holder.

According to regulation 6 (3) (b) of R247¹, an RPO shall be any person "with knowledge and experience of-

- (i) the basic principles of radiation protection and control in general; and
- (ii) such specific aspects of radiation protection and control, as may be applicable to the installation and working conditions that are covered by the authority concerned."

Except where the authority holder is also the RPO, the authority holder and RPO shall enter in to a written contract (a) declaring that the authority holder has authority to appoint the RPO, and (b) specifying the duties, responsibilities and authority delegated to the RPO in order to ensure compliance with the Act and regulations. A copy of the contract must be available if requested by Radiation Control.

Regulation 6 should be read in conjunction with regulations 7, 26 and 28. It should be noted that the existing Guidelines on RPO duties and on Internal Rules are currently being reviewed.

B. Competence

The RPO must be able to demonstrate the required competence to perform the responsibilities associated with that position. This includes knowledge of basic aspects of radiation protection and control, and training appropriate to the activities, actions and operations associated with the authority. It also includes knowledge of

¹ Regulations relating to Group IV Hazardous Substances, made in terms of section 29 of the Hazardous Substances Act, 1973 (Act No. 15 of 1973) and published under Government Notice R247 in Government Gazette 14596, dated 26 February 1993.

and competence to exercise all legislative functions related to the authority. The RPO should therefore be trained in radiation safety and protection as well as in RPO-specific responsibilities related to the legislative requirements.

RPAs: Should the RPO lack the necessary knowledge or competence related to a specific and technically advanced aspect of his/her duties, the authority holder may acquire the services of a radiation protection adviser (RPA) as per regulation 28 to provide technical assistance, e.g. shielding calculations or decontamination. In such a case, the authority holder shall enter into a written contract and a service level agreement with the RPA, clearly specifying the latter's responsibilities. In order to be registered on the authority, the RPA shall submit a completed application form RN786A and provide proof of competence in the specified areas. If satisfied, Radiation Control will issue a registration certificate linking the RPA with the authority holder and specifying the services to be provided.

C. Training

The Directorate: Radiation Control currently has no specific requirements regarding training courses for RPOs for the use of radioactive sources. There is, however, a general requirement for any RPO to give proof of competence to act as RPO in line with the requirements of the Hazardous Substances Act 15 of 1973 and the RPO Guidelines. Such proof could be in the form of previous experience and/or attendance of an appropriate short training course.

At present the IAEA Regional Training Centre at Necsa (Nuclear Energy Corporation of South Africa, Pelindaba) is the only institution that provides SAQA-accredited training courses. The courses presented by Necsa range in duration from two to five days, depending on the particular application, e.g. soil gauges, industrial radiography, or first responders. Contact Dr RD Mavunda at risimati.mavunda@necsa.co.za; Tel: 012-305 3809; Cell: 072 698 5153.

A number of other, non-accredited, short courses are also available. The following should be noted:

- Certificates issued by individuals offering short courses are only attendance certificates, and the content varies depending on the background of the course presenter. There is no guarantee that these training programmes cover all aspects related to radiation safety and protection, or that the content is technically and scientifically correct and in line with international standards.
- 2. None of these presenters can claim that their course is "approved" by the Department of Health or the Directorate: Radiation Control. Any such claim would be a misrepresentation, which is a criminal offence.
- 3. The Directorate: Radiation Control currently has no requirement for repeat or refresher courses. This means that no person or organisation offering courses for RPOs may set expiry dates on their attendance certificates or claim that the course has to be repeated at specified intervals.
- 4. Further, no individual or organisation may claim SAQA accreditation for their courses unless they can provide verifiable evidence of such accreditation.

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