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GUIDELINE ON RADIATION PROTECTION OFFICER (RPO) COMPETENCE AND TRAINING REQUIREMENTS

To provide recommendations and guidance to the applicant for an authority or an authority holder on how to comply with the legislative requirements for the appointment of a radiation protection officer (RPO).

Document History

Final Version	Reason for Amendment	Effective Date
1	First issue, industrial comments incorporated and published for implementation	August 2015
2	<ul style="list-style-type: none"> - Content structured on the new SAHPRA Guideline Template - A unique document number SAHPGL-RDN-RN-11 allocated to this Guideline - Form RN786A changed to GLF-RDN-RN-18C 	December 2022

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Glossary

Abbreviation/ Term	Meaning
RPA	Radiation Protection Advisor
RPO	Radiation Protection Officer

1. INTRODUCTION

The appointment of a Radiation Protection Officer (RPO) and acting RPO is a legal requirement that must be satisfied before an applicant can engage in the activities authorized by the SAHPRA Radiation Control.

1.1 Purpose

In this document we provide recommendations and guidance on how to comply with the legislative requirements.

1.2 Scope

The RPO must be provided with sufficient training to enable him to be able to effectively carry out his supervisory duties. However, education and training are only two of several attributes that result in a person being both competent and suitable to act as an RPO for a practice. The provision of training covering the core information that is required for all RPOs will provide an appropriate level of knowledge, but this will need to be re-enforced with practical experience of the application of this knowledge before the RPO can be said to be competent.

2. LEGAL PROVISION

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 the basic principles of radiation protection and control in general; and 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 a written contract declaring that the authority holder has authority to appoint the RPO, and specifying the duties, responsibilities and authority delegated to the RPO 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.

3. REQUIREMENTS FOR APPOINTMENT AS A RADIATION PROTECTION OFFICER

3.1 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 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. To be registered on the authority, the RPA shall submit a completed application form **GLF-RDN-RN-18C** (*Old 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.

3.2 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) as well as Cape Lab Training center are the only institutions that provides SAQA-accredited training courses. The courses presented range in duration from two to five days, depending on the application, e.g., soil gauges, industrial radiography, or first responders.

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

- (a) 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 programs cover all aspects related to radiation safety and protection, or that the content is

technically and scientifically correct and in line with international standards.

- (b) 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.
- (c) 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 must be repeated at specified intervals.
- (d) Further, no individual or organisation may claim SAQA accreditation for their courses unless they can provide verifiable evidence of such accreditation.

4. REFERENCES

The following related documents are referenced:

- 4.1 R246 & R247, Regulation published under Government Notice R246 in Government Gazette 14596 of 26 February 1993
- 4.2 Hazardous Substances Act, 1973 (Act No. 15 of 1973)

5. VALIDITY

This guideline is valid for a period of 5 years from the effective date of revision and replaces the old guideline on RPO Competence and Training Requirements, revised in August 2015. It will be reviewed on this timeframe or as and when required.