WHY DO WE HAVE REGULATORS?

“The Regulator is the nasty man (or woman) that comes in and stops us doing what we want to do”

“I’d be able to do more work if I didn’t have so much red-tape to complete every time I did anything”

“I know what I am doing so I will be perfectly safe”

It may appear from the above comments that the role of the Regulator is to hinder our work. Indeed, in some instances, this may well be the apparent effect. In horse-racing the horses are sometimes blinkered to avoid them being distracted by events going on around them. Similarly, in our work, our interest is often totally concentrated on the work in hand and we may be oblivious or blinkered to the effect of our work on our surroundings.

The ‘red-tape’, such as Risk Assessments and Local Rules, are intended to help us consider how we may proceed to work with minimal damage to ourselves or our surroundings. The ‘red-tape’ needs to help us consider how we may proceed to work with minimal damage to ourselves or our surroundings (including colleagues). They assist in focussing considerations not only on our work but on what risks may be involved. 'Red-Tape' may also require us to record what we are doing and what disposals we make so that the impact on our environment may be assessed.

Regulations are laid down and Authorisations given in an attempt to provide as safe a work environment as possible for staff, students, and the general public. Both the Safety Advisors Office and the Radiation Protection Office require a regime such as Risk Assessments in order that the University can demonstrate compliance with the Regulations and Authorisations, and that the safest work environment possible is being achieved.

Where do the Regulators come in? They will make periodic visits to satisfy themselves that the procedures to ensure compliance are adequate. They are not only coming to inspect the worker in the Department but also the Advisor whose task it is to advise on procedures etc. They are empowered to visit at any time without prior notice, although they usually arrange an appointment for routine inspections.

Provided that all paperwork is in order (as of course it is, isn’t it?) and work is seen to be in conformity with Local Rules then the Regulator may merely give some friendly advice on improvement in techniques. Remember they have visited many places and are in a position to promote changes in working practice that they have noted elsewhere. We can thereby learn from other’s experience. However if you don’t comply, then beware the falling bricks!

FAMILIARITY BREEDS CONTEMPT

Many years ago Radiation Protection Office were asked to advise on the use of radioactive material in a department. The proposal was to use relative small amount of a weak Beta emitter (Tritium), the radiation from which would not even penetrate paper. On being invited to enter the laboratory in which the work was to be done RPIO staff queried the Biohazard sign on the door and asked if it was safe to enter.

“Yes, of course, it’s only smallpox. Now about this Tritium?”

The worker was totally familiar with the hazards of working with a pathogen but had no experience with radioactive material, whilst RPO staff were more concerned with the pathogen.

BE AWARE THAT NOT EVERYONE WILL BE AS FAMILIAR WITH THE HAZARDS AS YOU ARE
Duties of the Radiation Protection Office:
The duties of the RPO are generally four-fold.
1. To protect the staff and students from the hazards of radiation
2. To protect the general public from work at the University of Liverpool
3. To protect the environment from the discharges of radioactive waste that arise at the University of Liverpool
4. To protect the University of Liverpool from legal action that can arise from non-compliance and/or poor practice

CONTROL OF ARTIFICIAL OPTICAL RADIATION AT WORK

The Control of Artificial Optical Radiation at Work Regulations come into force on 27th April 2010.

They require all artificially produced sources of light to have been risk assessed. A documented Risk Assessment must be produced.

The priority sources at the University of Liverpool for which Risk Assessments must be produced are UV lamps (transilluminators, hand-held fluorescence lamps, germicidal tubes, etc) and lasers.

The Radiation Protection Office will be available to give advice on the production of Risk Assessments. The Radiation Protection Office can also advise on suitable control measures and/or assist with UV measurements where necessary. However, it is the responsibility of the individual user to ensure that the Risk Assessments exist.

Templates for Laser and UV Risk Assessments are available for download on Radiation Protection Office website

There are generic Risk Assessments available for some sources of artificial light and examples of these may be downloaded from the Radiation Protection Office website at http://www.liv.ac.uk/radiation

ENVIRONMENTAL PERMITTING REGULATIONS 2010

New Regulations are like buses—they never come along by themselves but in convoy and late!

The Environmental Permitting Regulations 2010 (EPR2010) came into force on 6th April 2010 and supposedly replaces the Radioactive Substances Act 1993 (RSA93). However the Exemption Orders and some other aspects of RSA93 are still subject to amendment and, accordingly, EPR2010 will continue to recognise RSA93 until the amendments can be completed.

EPR2010 is intended to combine the regulatory impact of all potential pollution hazards into one set of uniform regulations.

As far as users of radioactive material in the University of Liverpool are concerned it will be a relatively transparent transfer of Regulation as most of the requirements of RSA93 are incorporated in EPR2010.

However all references to RSA93 should now be changed to EPR2010 in all documentation. Updated versions of the general Local Rules incorporating the change in reference are available on the website.

DESIGN FAULT

Recently a fume cupboard was fitted during a departmental refurbishment in which a UV germicidal lamp was installed. The switch for the lamp had no warning indicator for when the UV lamp was energised and it was noted that the UV lamp was visible through the air vent above the sash. There was no apparent shielding and no interlock to switch off the lamp when the sash was raised. The unit concerned was manufactured by MachAire. Please ensure that, if your fume cupboard or hood has a UV lamp fitted that no UV emission can be observed outside the cupboard or hood.

REMEDIAl TRAINING

Following the incident in midsummer of 2009 in which a radioactive source was ‘mislaid’. A review of procedures was conducted at Leahurst by the Dean of Faculty.

It was decided that remedial training, as a refresher, should be given to all staff using ionizing radiation.

A series of training seminars was conducted during March at Leahurst. They were well received and appreciated. A total of 92 staff attended.

CHANGE IN REGULATOR

We have been advised that the areas covered by the Environment Agency Inspectors in the North have been changed.

Martin Ainsworth who made his first visit to the University of Liverpool in July 2009 is now to cover an area further East and the area covered by the Inspector from Preston has expanded to include Merseyside.

Her name is Eileen Inward and we are anticipating that she will wish to visit her new ‘patch’ in early summer.

Please send any comments on the work of Radiation Protection Office to rad.pro@liv.ac.uk