



22 January 2014

PNRI INFORMATION NOTICE 2014-01

NEW REGULATION: CPR PART 27, “Security Requirements in the Transport of Radioactive Material”

ADDRESSEES

All current holders of PNRI Radioactive Material License.

PURPOSE

The Philippine Nuclear Research Institute (PNRI) is issuing this information notice to inform addressees of the new Code of PNRI Regulations (CPR) Part 27 “Security Requirements in the Transport of Radioactive Material”. The PNRI developed the CPR to achieve and maintain a high level of security during transport of radioactive material that is commensurate with the potential hazard posed by the radioactive material and to prevent unauthorized access or damage to, and loss, theft, sabotage, or unauthorized transfer of radioactive material during transport.

This regulation provides requirements in implementing, maintaining or enhancing a nuclear security regime to protect radioactive material while in transport against theft, sabotage or other malicious acts that could, if successful, have unacceptable radiological consequences.

The PNRI expects that addressees will review the information for applicability to their transport activities and consider actions, as appropriate.

DESCRIPTION OF CIRCUMSTANCES

The potential threat of terrorism involving nuclear or other radioactive materials has been dramatically heightened since the 9/11 event in the USA. There is now a growing concern that terrorist groups can and may gain access to radioactive sources and plan attacks on nations worldwide.

The vulnerability of the Philippines to nuclear terrorism depends to a great extent on the level of security existing for radioactive sources. While the government bears the primary responsibility for the security of radioactive sources in accordance with its constitutional mandate to ensure the safety and well-being of the citizens, it is imperative that it ensures that these sources are used within an appropriate regulatory framework of security.

Given the vulnerability of radioactive sources during transport, PNRI has developed CPR Part 27 to address security concerns in the transport of radioactive sources. Based on the IAEA Nuclear Security Series No. 9, “Security in the Transport of Radioactive Material”, CPR

Part 27 presents a defensible technical basis for establishing security levels for the protection of radioactive material.

CPR Part 27 applies to the security in the transport of all packages containing radioactive material that may pose a significant radiological hazard to individuals, society and the environment as a consequence of a malicious act involving the radioactive material.

DISCUSSION

The CPR Part 27 was published in the Official Gazette Vol. 109 No. 47 on 25 November 2013 and took effect fifteen (15) days thereafter. The CPR Part 27 requirements are applicable to all applicants and addressees.

Chapter II of the regulation provides for the Administrative Requirements for legal and governmental infrastructure for transport security, including:

- Procedure for submission by the licensee and approval by PNRI of a security plan prior to transport of radioactive material;
- Development of a programme for verifying continued compliance with the security regulations through periodic inspections and by ensuring that corrective actions are taken when needed;
- Development of a policy to identify, classify and control sensitive information, the unauthorized disclosure of which could compromise the security of radioactive material in transport;
- Determination of security clearance procedures, including a positive identification programme for persons engaged in the transport of radioactive material, commensurate with their responsibilities;
- Reporting of security-related events, including losses; and
- Establishment of criminal penalties for non-compliance with the requirements for security in transport.

Sec. 12 states the responsibility of the licensee for establishing and implementing the administrative and technical measures that are needed to ensure the security of radioactive material during transport and to comply with all applicable requirements of the CPR and the conditions of the license. The licensee is responsible to designate a Security Manager in key assignments related to the security in the transport of radioactive material.

The responsibilities of the Security Manager are stated in Sec. 13.

Sec. 19 requires the licensee transporting a package with radioactive content meeting the enhanced security level to establish or contract a service provider for a Transport Control Center (TCC) that is capable of maintaining continuous conveyance location and security status information for a shipment of radioactive material.

The Technical Requirements stated in Chapter III of the regulation require the licensee to:

- Identify the radionuclides and their activities in each radioactive material package and the mode(s) of transport used;
- Assign security levels to the packages;

- Determine appropriate security measures to meet regulatory requirements or to protect against the design basis threat.

Section 21 states the security levels in specifying appropriate security measures for packages of radioactive material on the basis of their potential consequences. Appendix I lists the transport security radioactivity threshold. The radioactivity threshold per radionuclide is provided in Table 1 and the incremental transport levels are provided in Fig. 1.

Section 23 states the security measures that could be used to protect radioactive material against theft, sabotage, or other malicious acts during its transport. Appendix II reflects the table that outlines the security measures for radioactive material during transport for the different security levels.

Section 27 states the requirement for the licensee to have contingency plans in place to respond to malicious acts involving radioactive material in transport, including plans for the recovery of lost or stolen material and for mitigating consequences.

Section 28 states the requirements for the licensees engaged in the transport of radioactive material packages requiring the enhanced security level to develop, adopt, implement, periodically review as necessary and comply with the provisions of a security plan. Appendix III shows an example of the format and content of a transport security plan.

This regulation provides the PNRI the right to withhold or recall radioactive material when used in violation of the law or regulations of the PNRI, or in a manner other than as disclosed in the application and license approved by the PNRI.

The revised CPR Part 27 is now available and can be downloaded from the PNRI website. (www.pnri.dost.gov.ph).

REQUIRED LICENSEE RESPONSE

The new regulation contains requirements that addressees are required to comply.

CONTACT

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