



## Regulatory Requirements for the Security of Industrial Radiography and Well-Logging Radioactive Sources: MALAYSIA

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- (1) Regulatory Requirements
- (2) Regulated Activities, Security
  Systems and Support Agencies
- (3) Security Events: Lesson Learned



## **Legislative and Organization Structure**

#### **Main Acts**

Atomic Energy Licensing Act 1984 (Act 304)

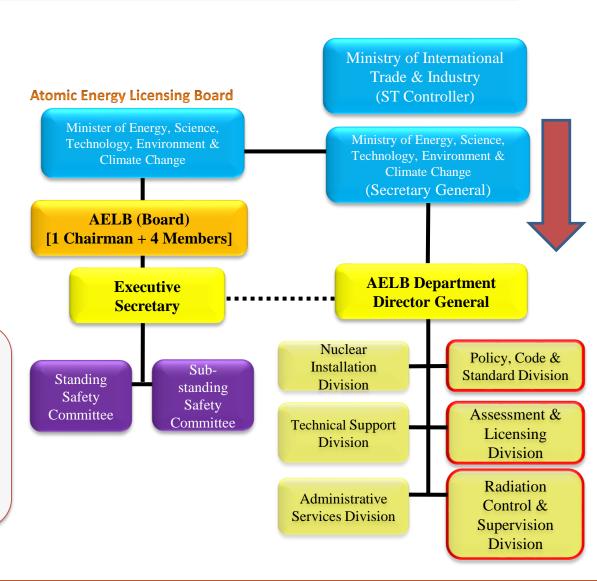
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Strategic Trade Act 2010 (Act 708)

- To provide for the regulation and control of atomic energy technology & its trade.
- For the establishment of standards on liability for nuclear damage.
- For matters connected therewith or related thereto.

Regulatory Body & ST Relevant Authority

- Atomic Energy Licensing Board (AELB) was establish under Section 3 of the Act 304.
- Ensuring safety, security and safeguarding peaceful Nuclear Activities.



## **Regulatory Control Hierarchy**









# Act Regulations Orders License Conditions

Code of Practice Material Advisor





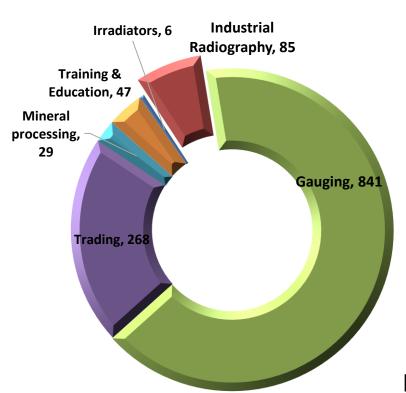
#### **Mandatory**

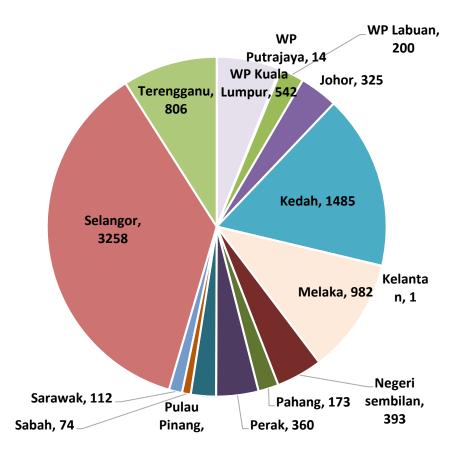
- Subsidiary Regulations under the Act 304:
  - Radiation Protection (Licensing)Regulations 1986
  - Radiation Protection (Transport)Regulations 1989
  - Atomic Energy Licensing (Appeal)Regulations 1990
  - Atomic Energy Licensing (Basic Safety Radiation Protection)
     Regulations 2010
  - Atomic Energy Licensing
     (Radioactive Waste
     Management) Regulations 2011

PARTIES WITH RESPONSIBILITIES FOR PROTECTION AND SAFETY SHALL ENSURE THAT THE PRINCIPLES OF RADIATION PROTECTION ARE APPLIED FOR ALL EXPOSURE SITUATIONS.

#### REGULATED ACTIVITIES

**NUMBERS OF LICENSE HOLDERS** - 1193





NUMBERS OF RADIOACTIVE MATERIALS - 8939

Sources: eSPP AELB 2018

## Code of Conduct on The Safety and Security of Radioactive Sources



- Approved by the IAEA Board of Governors on 19 September 2003.
- Approved by the AELB's Board of Meeting for adaption on August 2007.

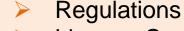
## **Adoption of CoC - Way Forward**

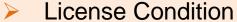
AELB make compulsory to licensee to implements the elements of Code of Conduct on the Safety and Security of Radioactive Sources and the three supporting documents;

- Categorization of Radioactive Sources
- 2. Security of Radioactive Sources
- 3. Guidelines on Import and Export of Radioactive Sources

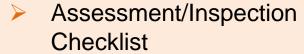
In effective August 2008.

#### Security Implementations:









- Guidance
- Awareness Programmed



## **Atomic Energy Licensing (Basic Safety Radiation Protection) Regulations 2010**

PART VI : POTENTIAL EXPOSURE AND SAFETY OF RADIATION SOURCES

#### Reg. 69: Accountability for Radiation Source

The licensee shall maintain an accountability system that includes records of — (a) the location and description of each radiation source which is in his possession or under his control; and

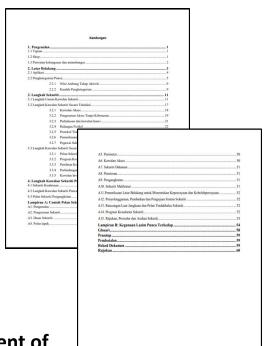
(b) the activity and description of each RAM, NM & PS which are in his possession or under his control.

#### Reg. 70: Security and Protection of Radiation Source

The licensee shall take measures to protect all radiation sources to prevent theft or sabotage.

## **Security Plan**





Guidance on the Development of Security Plan of Radioactive Sources (LEM/TEK/62 Sem.2 29 Oktober 2018)

#### Contents:

- Security Measures (Technical and Administrative)
- Security Measures During Transportation and Storage
- Security of Information
- Inventory of Radioactive Sources
- Maintenance and Testing
- Personnel Screening
- Response Action
- Awareness programmed
- Example of Security Plan

## Purpose of a Security System

A security system should be designed to **prevent unauthorized access** to radioactive sources at all stages of their **life cycles** (storage, use, transport, decommissioning and disposal), in order to;

- Prevent unauthorized transfer and use and of radioactive sources
- Prevent damage to radioactive sources
- Prevent loss of radioactive sources
- Prevent theft of radioactive sources
- Deter adversaries from committing a malicious act, or
- Minimize through detection, delay and response the likelihood of an adversary succeeding in completing such a malicious act.

## Security Level Base on Categorization System

CATEGORY	TYPE OF SOURCES	ACTIVITY RATIO A/D	SECURITY LEVEL	
1	Irradiators Teletherapy sources	A/D ≥ 1000	А	
2	Industrial gamma radiography sources High/medium dose rate brachytherapy sources	1000 > A/D ≥ 10	В	
3	Industrial gauges with high activity sources Well logging gauges	10 > A/D ≥ 1	С	
4	Low dose rate brachytherapy sources Industrial gauges with moderate/low activity sources	1 > A/D ≥ 0.01	*Apply measures as described in the Basic Safety Standards - Asset	
5	Positron emission tomography (PET) sources Electron capture devices	0.01 > A/D & A > exempt		

Sources: IAEA Nuclear Security Series No. 11 -Security of Radioactive Sources

#### **CATEGORY 2**

 $1000 > A/D \ge 10$ 

#### **Examples**:

- Industrial gamma radiography sources (Co-60, Ir-192)
- High/medium dose rate brachytherapy sources







#### **CATEGORY 3**

10 > A/D ≥ 1

#### Examples:

- Fixed industrial gauges that incorporate high activity sources (Co-60, Cs-137)
- **▶** Well logging gauges (Cs-137, Am-Be 241)









## **Description Of Security Measures**

To meet the security objectives a combination of security measures, need to be implemented including;

- General administrative measures (common for the management of all sources)
- Administrative measures (graded according to security level)
- Technical measures (graded according to security level)

## **Security Functions**

A security system to protect radioactive sources should be designed to perform basic security functions:

- > Deterrence
- > Detection
- > Delay
- Response
- Security Management



## **Applicable Security Measures**

#### **Administrative**

- Access control procedures;
- Alarmed access points (e.g. with radiation detectors);
- Key control procedures;
- Video cameras or personal surveillance;
- Records related to the management of sources;
- Source inventories;
- Regulations and guidance;
- Reliability and trustworthiness of personnel;
- Information security;
- Quality assurance measures; and
- Establishment of a safety culture and security culture.







## Radioactive Storage (Industrial Radiography)



Concrete Wall, Steel Door and Lock



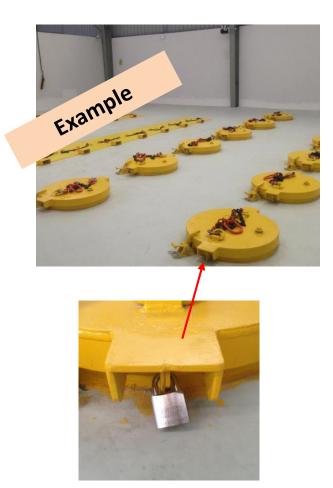


Storage Pit and Lock

## Radioactive Storage (Well-logging)



Double Lock and CCTV Inside/Outside Building



Storage Pit Lock

## **Applicable Security Measures**

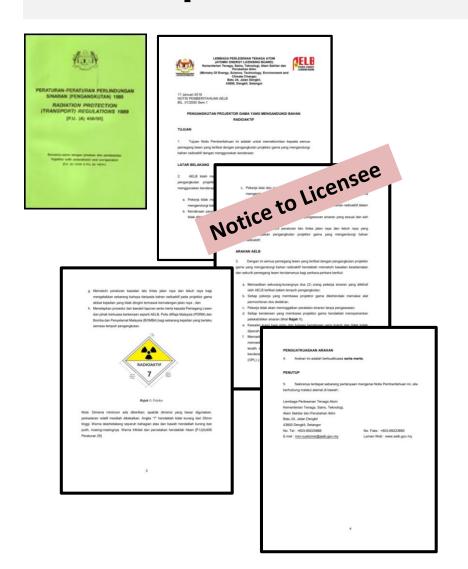
#### Technical Measures

- > Fences
- Walls
- Cages
- Transport packaging
- Locked
- Shielded containers
- Intrusion detection systems
- Locks, hinges and interlocks for doors





## **Transportation of Radioactive Material**





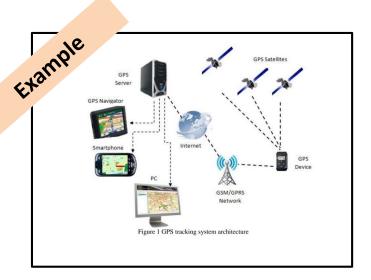
## **Way Forward?**

GPS tracking system towards all mobile sources; still under technical review and consideration.

## **BENEFIT vs COST**



**START-88S - KOREA** 



#### INSTITUTIONALIZE KNOWLEDGE & EXPERIENCE

APPROACH	ACTIVITIES
COMMUNICATION & COORDINATION	➤ BRIEFING, TALKS, VISITS, INTRODUCTION TO DETECTION EQUIPMENT, MOCK DEMONSTRATION
JOINT TRAINING & EXERCISE	CLASSROOM LECTURE, TABLE TOP EXERCISE, FAMILIARIZATION OF EXERCISE FLOW
INTEGRATED OPERATIONAL PROTOCOLS & PROCEDURES	<ul> <li>APPLY THE EXISTING LAW</li> <li>ENHANCE &amp; MODIFY PROCEDURES FOR RESPONSE TO INCLUDE THE THREAT OF RADIOLOGICAL CONSEQUENCES FOR RESPONDERS</li> </ul>
AWARENESS ON THE EXISTENCE OF MATERIAL	FAMILIARIZATION OF NUCLEAR & RADIOACTIVE MATERIAL, ITS DANGER AND PROTECTION PROCEDURES

## INCORPORATING LAW ENFORCEMENT AGENCIES FOR NUCLEAR SECURITY

APPROACH	METHOD	FUNCTIONAL RESPONSIBILITY	REFERENCE
PREVENTION	DETER, DISSUADE, PROTECT, SECURE	<ul> <li>✓ COUNTER TERRORISM DIVISION</li> <li>✓ CUSTOM &amp; BORDER PROTECTION</li> <li>✓ FACILITY OWNER</li> </ul>	<ul> <li>SOSMA / PENAL CODE (CHAPTER VIA)</li> <li>OTHER RELEVANT LAWS</li> <li>ACT 304</li> </ul>
DETECTION	THREAT ASSESSMENT, DETECT THREAT, ALARM ASSESSMENT, ALERT THE AUTHORITY	<ul> <li>✓ CUSTOM &amp; BORDER PROTECTION</li> <li>✓ FACILITY OWNER</li> <li>✓ COUNTER TERRORISM DIVISION</li> <li>✓ GENERAL DUTY POLICE</li> </ul>	<ul> <li>SOSMA / PENAL CODE (CHAPTER VIA)</li> <li>LICENSING CONDITIONS ISSUED BY AELB (REGULATOR)</li> <li>ACT 304</li> </ul>
RESPONSE	INTERDICT, MANAGE CRIME SCENE, PROTECT EVIDENCE, ANALYZE EVIDENCE, ATTRIBUTE, RETURN ITEM, PROSECUTE	<ul> <li>✓ COUNTER TERRORISM DIVISION</li> <li>✓ FORENSIC CAPABILITY</li> <li>✓ GENERAL DUTY POLICING</li> <li>✓ CRIME PREVENTION &amp; COMMUNITY SAFETY</li> <li>✓ LOCAL POLICE &amp; CROWD CONTROL</li> <li>✓ LOCAL COUNCILS &amp; VOLUNTARY CORPS</li> <li>✓ SPECIAL FORCES IF NEEDED</li> </ul>	<ul> <li>SOSMA / PENAL CODE (CHAPTER VIA)</li> <li>NSC DIRECTIVE 20 (MANAGEMENT OF DISASTER)</li> <li>NSC DIRECTIVE 18 (MANAGEMENT OF TERRORISM INCIDENT)</li> <li>ACT 304</li> </ul>

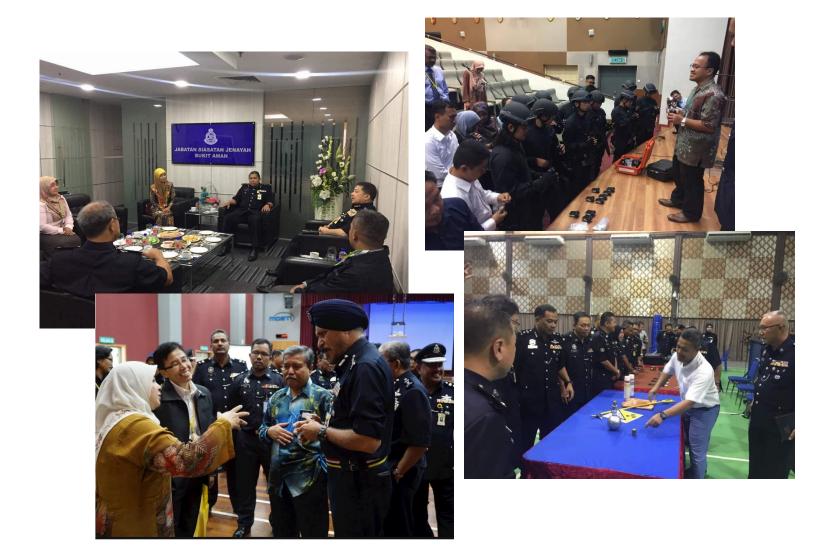
### RMP Support for Nuclear Security

RMP are likely to be the first to encounter nuclear security threats while conducting their routine security and public safety work

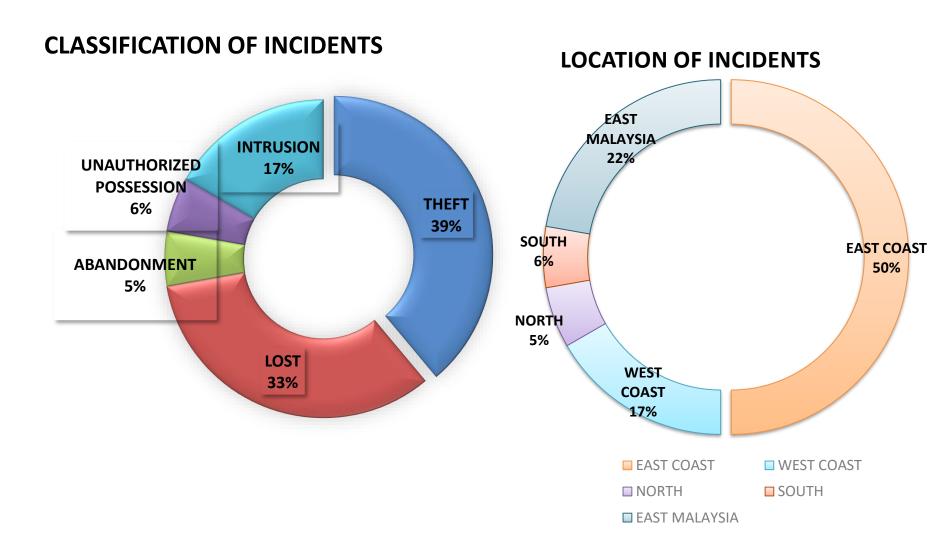
- Security patrols
- Traffic stops/checkpoints
- Public safety
- Investigations
- Intelligence
- Strategic locations and critical infrastructure security
- Border Control



## **Engagement with AELB**



## Statistical analysis



### Stolen of gamma projector

#### The Background

•Year : 2017

Location : Klang, Selangor

 Material: 2 unit of Gamma Projector (Ir-192: 43.6 & 35.8 Ci)

#### The Incident

- On February 09th 2017 two (2) units of gamma projectors model Sentinel 880 Delta belongs to an industrial radiography company was stolen from a vehicle parked at commercial building in Klang, Selangor.
- The gamma projectors contained Ir-192 sources with 43.6 and 35.8 Ci respectively. The incident was reported to local Police and AELB immediately.

#### **The Response**

- On the same day, join search effort was conduct by AELB Emergency Response Team with a cooperation from IPD Klang Selatan and the company around the city.
- On February 11th 2017, as a result from extensive search effort, the remaining of gamma projector was found at a illegal scrap metal premise at Jalan Kebun, Klang and the Ir-192 sources was found at a residential area of Sri Era Apartment, Shah Alam.







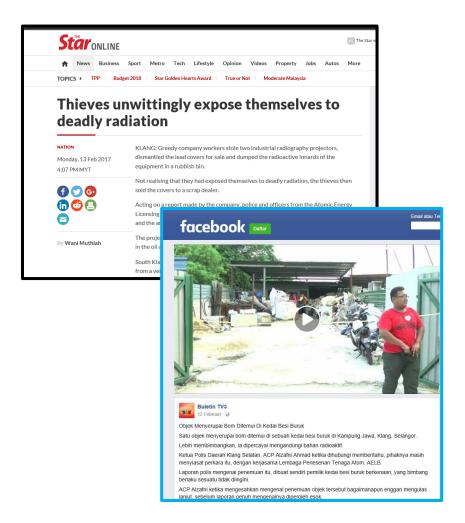






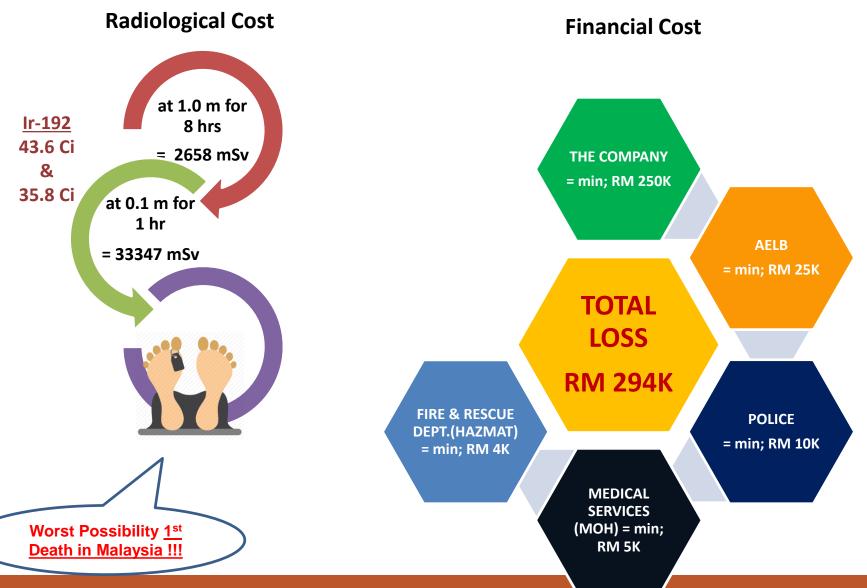


### **News and Media**





#### **ESTIMATED COST & FINANCIAL LOSS 2017**



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## THANK YOU