



25 June 2014

PNRI INFORMATION NOTICE 2014-04

REVISED REGULATION: CPR PART 26, “SECURITY OF RADIOACTIVE SOURCES”

ADDRESSEES

All current holders of PNRI Radioactive Material License.

PURPOSE

The Philippine Nuclear Research Institute (PNRI) is issuing this information notice to inform current license holders of the Code of PNRI Regulations (CPR) Part 26 “Security of Radioactive Source”, Rev.1. The PNRI has revised the CPR Part 26 to include provisions that will aid licensees achieve and maintain a high level of security of radioactive sources that is commensurate with the potential hazard posed by the radioactive sources and to prevent unauthorized access or damage to, and loss, theft, sabotage, or unauthorized transfer of radioactive sources for malicious act.

The revised CPR provides requirements in implementing, maintaining or enhancing a nuclear security regime for the radioactive sources against theft, sabotage or other malicious acts that could, if successful, have unacceptable radiological consequences.

The PNRI expects that licensees will review the information for applicability to their licensed 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 and 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 in ensuring that proper and adequate security is applied to these radioactive sources by the licensees for the welfare and protection of the general public, it is imperative that these sources are used within an appropriate regulatory framework of security.

Given the vulnerability of radioactive sources, the PNRI has revised the CPR Part 26 to address the changes and updates of security of radioactive sources based on the IAEA Nuclear Security Series No. 11, "Security of Radioactive Sources". The CPR Part 26, Rev. 1 presents a defensible technical basis for establishing security levels for the radioactive sources that may pose a significant radiological hazard to individuals, society and the environment as a consequence of a malicious act involving the radioactive source.

DISCUSSION

The CPR Part 26, Rev. 1 was published in the Official Gazette Vol. 110 No. 21 on 26 May 2014 and took effect fifteen (15) days thereafter. The revised CPR Part 26 requirements are applicable to all applicants and addressees.

The revisions to the CPR include the following changes:

A. New Provisions:

Section 1 – Purpose.

- (1) The requirements in this Part are issued pursuant to Section 3(f)(3) of the Republic Act No. 9372, also known as "Human Security Act of 2007", an act to secure the state and protect our people from terrorism;
- (2) The objective of this Part also includes the establishment and maintenance of the security of radioactive sources throughout their entire life cycle and to prevent unauthorized access or damage to, and loss, theft or unauthorized transfer of radioactive sources, so as to reduce the likelihood of accidental harmful exposure to such radioactive sources or the malicious use of such radioactive sources to cause harm to individuals, society, or the environment.

Section 4 – Definitions.

The following terminologies have been either defined or changed in order to harmonize with the terminology used in IAEA Nuclear Security Series 11 (NSSS 11) - Security of Radioactive Sources, IAEA NSSS 9 - Security in the Transport of Radioactive Material, and other relevant international safety standards and regulations:

- Detection;
- Malicious Act;
- Person;
- Response;
- Security;
- Security Culture;
- Security Contingency Plan;
- Security Goal;
- Security Management;
- Security Plan;
- Security System;
- Threat; and
- Transfer

Section 11 – Responsibilities of Licensees.

An additional requirement has been included for the licensee to notify PNRI of any intention to introduce any amendment to an authorized practice, which could have implications to security, and shall not carry out such amendment unless specifically authorized by PNRI.

Section 12 – Security Manager.

This Section states the duties and responsibilities of a Security Manager.

Section 13 – Security Culture.

This Section states the additional requirements included so that sensitive information relative to the security of radioactive sources is identified and protected; and security of radioactive sources is managed in accordance with a security plan commensurate with the security level of the radioactive sources.

Section 16 – Training of Personnel.

This Section states the training requirements that must be satisfied by personnel responsible for the security plan including the effective implementation of security measures. The concerned personnel must undergo training on security awareness and periodic refresher training.

Section 19 – Security System and Security Functions.

This Section states that the licensee must ensure that a security system is designed and installed to protect radioactive sources from an adversary intent on committing a malicious act. The design must be able to perform the basic security functions: detection, delay, response, and security management.

Section 20 – Design and Evaluation of Security Systems.

This Section states that the licensee must ensure that its security system integrates measures to perform the basic security functions in accordance with Section 19 of the CPR so as to effectively secure the target from the threat, consistent with the security concepts.

Section 23 – Storage and Disposition of Disused Sources.

This Section states that disused sources that are on long-term storage or disposal in facilities must be categorized according to the aggregation within a conditioned container or storage location and that facilities specifically licensed for long-term storage of radioactive sources must meet the requirements for the highest security level for which they have been authorized.

Section 25 – Determination of Applicable Security Level of a Given Source.

This Section states that the licensee must determine the security level commensurate to the categorization of the radioactive source as shown in Table 2 – Table of D-Values of the CPR wherein each security level has a corresponding security goal.

Section 26 – Security Levels, Goals and Objectives.

This Section prescribes the licensee to ensure that the security systems meet the overall security goal for each security level and corresponding objectives as prescribed in Table 1- Security Levels and Security Objectives, and that the licensee must perform tests, assessments or inspections to determine the overall effectiveness of the facility's security system and evaluate against the applicable security goals and objectives.

Section 37 – Inspections.

This Section prescribes the licensee to allow the PNRI immediate access to premises and facilities in which radioactive sources are located in order to obtain information about the status of security and verify compliance with regulatory requirements and to provide the opportunity to conduct its own performance testing of security measures at all reasonable times.

- B. The following provisions stipulated in CPR Part 26, Rev. 0 are no longer used in the revised CPR.

Section 2 – Scope.

The "import or export" activity have been deleted.

Section 4 – Definitions.

The following terms have been deleted for they are no longer significant:

- **Export;**
- **Import;**
- **Response Forces;** and
- **Vulnerable Source.**

Section 13 – Radioactive Source Security Requirements

Section 20 – Security Assessments

Section 22 – Supply and Distribution of Sources

Section 23 – Export of Radioactive Sources

Section 24 – Import of Radioactive Sources

Section 31 – Key Control Requirements

- C. The following terminologies and sub-titles have been modified:
- "Human Factors" changed to "**Training For Personnel**";
 - "Inventorying" to "**Inventory**";
 - "Safety and Security Culture" to "**Security Culture**";
 - "Trustworthiness of Persons Managing Sources" to "**Trustworthiness of Individuals Managing Sources**";
 - "Testing and Verification of Compliance" to "**Performance Testing and Verification of Compliance**";
 - "Security Group" to "**Security Level**"; and
 - "Emergency Security Plans" changed to "**Security Contingency Plans**".

The revised CPR provides the PNRI the right to withhold or recall radioactive sources from any person who willfully violates, attempts to violate or conspires to violate any rule or regulation or order issued, or in a manner other than as disclosed in the license application and conditions of the license issued by PNRI.

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

REQUIRED LICENSEE RESPONSE

The revised CPR contains new and additional requirements that all licensees are required to comply. The security system commensurate to the licensed activities should be integrated in the security plan to be submitted to PNRI.

CONTACT

If you have any questions about the information in this notice, please contact:

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APPROVED:

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Date: **27 June 2014**