

Draft minutes, meeting no 77 held on 24 November 2020 @ 13:00 via online Microsoft Teams meeting.

SUBJECT	DISCUSSION	TASKS ARISING
1 Welcome	<ul style="list-style-type: none"> Mr. Gangel welcomed representatives to the meeting and thanked all for making themselves available. 	
2 Present and apologies.	<p>1) The following persons attended the meeting:</p> <p>On behalf of the Metal Recyclers Association (MRA): Mr. L Markson Dark Metals</p> <p>On behalf of the Non-ferrous Metals Industry Association (NFMIA): Ms. C Winter Fry's Metals Ms. J Nayathi Fry's Metals</p> <p>On behalf of the Recycling Association of South Africa (RSA): No representation.</p> <p>On behalf of the Regulators / Government: Ms. C Akortia Necsa Mr. S Pheto NNR Mr. W. Speelman NNR</p> <p>On behalf of the South African Institute of Foundrymen (SAIF): No representation.</p> <p>On behalf of the South African Iron and Steel Institute (SAISI): Mr. D Gangel Columbus Stainless (Chairperson) Mr. J Labuschagne Scaw Metals Mr. J Schoeman AMSA</p> <p>In attendance: Mr. C Dednam Committee Secretariat (SAISI) Mr. A Audie Committee Secretariat (SAISI)</p> <p>2) Apologies were received from: Ms. C Stevens Scaw Metals (SAISI) Mr. N Ganey SA Steel Mills (SAISI) Mr. P Mohajane NNR Mr. R Mohammed SA Steel Mills (SAISI) Mr. M Qasim Unica Iron and Steel (SAISI) Mr. D Sennanye NNR Mr. E Tshabalala Necsa Mr. B Wild Star Recycling Company (MRA)</p>	
3 HAZCOM guideline on competition.	<ul style="list-style-type: none"> Mr. Gangel directed the attention of representatives to the standing agenda item regarding the HAZCOM Committee Guidelines on Competition in terms of HAZCOM Committee governance, as attached to the draft agenda, and requested all to comply. 	
4 Approval of the agenda.	<ul style="list-style-type: none"> The agenda for the 77th committee meeting was approved. 	
5 Approval of the minutes.	<ul style="list-style-type: none"> The minutes of the 76th meeting held on 25 August 2020 were approved as a true reflection of the proceedings following correction to: <ul style="list-style-type: none"> Page 2, point 6.6, 2nd bullet: "...to Necsa to store such specific NORM material." 	
6 Matters arising from the previous minutes not dealt with elsewhere:		
6.1 Necsa issuing invoices for collection of orphaned radioactive sources.	<ul style="list-style-type: none"> Mr. Gangel reported that an exploratory meeting between Necsa, Dept of Health, Dept of Mineral Resources & Energy, the National Nuclear Regulator and steel mills, coordinated by Mr. Tselane from Necsa, was held on 17 June 2020 to facilitate exploratory discussions and said that the secretariat, early in September 2020, followed up with Necsa on any feedback available on this matter. Ms. Akortia reported that in consultation with Mr. Tselane, Mr Tselane indicated that Ms. Akortia should, for purposes of feedback to this committee meeting, state that Necsa would be willing to assist industry where there was a need, but that such an arrangement could not be binding. Mr. Pheto reported that feedback was received from Mr. Mohajane that the matter of invoicing by Necsa for the collection of orphaned sources was discussed at the recent NNR Joint Consultative Committee (JCC) meeting, attended by the various regulators and the DMRE, and that a follow-up meeting on the matter will be held of which Mr. Mohajane would subsequently provide feedback to HAZCOM. 	

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6.2 National Radioactive Waste Disposal Institute (NRWDI).	<ul style="list-style-type: none"> Mr. Gangel said that earlier communication received from NRWDI indicated that a borehole disposal facility for disused sealed radioactive sources would only be available in 2025. It was agreed to keep the item on the agenda until the resolution of item 5.1. 	
6.3 SAPS Explosives Section and Necsa invoicing for collection of sources.	<ul style="list-style-type: none"> Mr. Gangel said that the discussion item could remain on the agenda until formal feedback from Necsa was forthcoming on the outcome of discussions between Necsa, the regulators and other governmental entities on the ethical removal of orphaned radioactive sources. 	
6.4 Armscor - directive from Necsa on radioactive aircraft engine parts.	<ul style="list-style-type: none"> Mr. Pheto reported that the contact details of the Armscor representative was obtained by the NNR from the HAZCOM secretariat and that the NNR would be setting up a meeting with Armscor in this regard. 	
6.5 Protocol on levels of responsibilities and controls regarding RA incidents.	<ul style="list-style-type: none"> Mr. Gangel referred to the exploratory meeting between regulators called by Necsa on 17 June 2020 stating that during the mentioned meeting the representative of the Department of Mineral Resources and Energy remarked that due to the fractured approach caused by the two regulators in place, namely the Department of Health and the National Nuclear regulator, that there was a task team to be established in terms of the harmonisation of the functions at Radiation Control (SAHPRA). Mr. Gangel suggested that the item remain on the agenda while awaiting resolution of item 5.1 and/or further feedback was received from the NNR on the outcome of the upcoming JCC meeting. 	
6.6 Procedures regarding NORM incidents.	<ul style="list-style-type: none"> Mr. Pheto said that the NNR was still engaging with the Department of Mineral Resources & Energy on the request to allow Necsa to store NORM recycled metal on behalf of the NNR and that the matter was also a discussion item on the NNR JCC. 	
6.7 Necsa Emergency Call Centre (ECC) and Hotline contact number.	<ul style="list-style-type: none"> Mr. Gangel said that the generally agreed upon resolution was to call the SAPS Explosives Section as first responders to radiation incidents of manmade sources and that the SAPS would in turn contact the Necsa Emergency Control Centre. Mr. Gangel said that the NNR inspectors would be called directly to assist in cases of NORM material. Ms. Akortia said that Necsa would still be receiving the sources as Necsa used to do, however, Necsa was of the opinion that a properly documented approach was to be finalised for dealing with orphaned sources. 	
6.8 General radiation detection procedures.	<ul style="list-style-type: none"> Mr. Gangel said that no amendments were made to the "General Radiation Detection Procedures" brochure since the previous committee meeting as no contact details changed in the meantime. 	
6.9 Register - Reporting hazardous incidents to central register.	<ul style="list-style-type: none"> It was noted that Cape Gate detected a Ra-226 source on 2 September 2020 that was removed by Necsa on 15 September 2020 and that the item appeared to be an electrical fuse. It was noted that Cape Gate detected Thorium 232 contaminated material on 20 October 2020 that was redirected to Scaw Metals and Mr. Labuschagne reported that Scaw Metals scanned the material with a handheld radiation detector and the material was sent directly to the melting pots due to the size of the material and the low radiation reading, where the material was diluted. Mr. Labuschagne reported that Scaw Metals were using handheld monitors at the weighbridge measuring Gamma radiation levels and were experiencing some difficulty with material arriving from the mines that were measured for Alpha and Beta radiation levels. Mr. Speelman said that the Alpha and Beta radiation readings were set at a threshold much lower than the typical Gamma readings, thus should there be Gamma radiation it should be picked up naturally by the Alpha and Beta readings dose rate that the mines also needed to comply with. 	

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	<ul style="list-style-type: none"> • On a question by Mr. Gangel if the testing procedures at the mines included more direct testing of material for Alpha and Beta readings, Mr. Speelman said that there were specific procedures the mines needed to comply with from the NORM side from NNR by doing a screening over a certain surface area of the material and the mines will record the Alpha and Beta readings and then also conduct a dose rate screening that would predominantly indicate the Gamma readings that needed to be also recorded. • Mr. Labuschagne reported that Scaw Metals received a truck from SA Metals on Sunday, 22 November 2020, with a dose rate of over 4000 and over 2900nsvh reading from a distance of 3 to 5 meters shielded by truck trailer. • Mr. Labuschagne reported that the item appeared to be a housing for a source and although the housing was apparently cleaned it was unknown were the specific source was. Mr. Labuschagne said that the truck was barricaded and according to the Scaw Metals policy and procedures, the truck was returned to SA Metals and that the authorities could not be reached on Sunday. • <i>(Secretary's note: The contact details of Lt. Col. Alberts at the Germiston SAPS Explosives Section were forwarded to Mr. Labuschagne on 24 November 2020.)</i> • It was noted that Cape Gate reported 5 NORM incidents and Columbus Stainless 2 NORM incidents in the time period since the previous HAZCOM Committee meeting, bringing the total reported NORM incidents to 34 for 2020 to date, compared with 27 for calendar year 2019 as a whole. • It was noted that SAHPRA informed HAZCOM by email that a vehicle, carrying two radioactive sources used for borehole logging, was hijacked on the R21 near Kempton Park on 9 Nov 2020 and that the case was reported to the police. • It was noted that SAHPRA informed HAZCOM by email that a vehicle carrying a Troxler soil gauge was hijacked on 14 November 2020 near South Gate in Johannesburg. 	
6.10 Additional measures to prevent the theft of radioactive sources in the first place.	<ul style="list-style-type: none"> • Ms. Gangel stated that license holders of sealed radiation sources in the various industries were required to report annually to SAHPRA on sources in their possession and that it was also a requirement of their authority holder agreement to immediately report to SAHPRA should a source be lost or stolen. 	
6.11 Training initiative and awareness campaigns at plant operator level.	<ul style="list-style-type: none"> • Mr. Pheto reported that there was no new development in regard to the NNR initiative to present a training workshop for the metal recycling industry, and that the NNR was working on the initiative and any progress will be reported on at the next HAZCOM committee meeting. 	
6.12 HAZCOM Committee in terms of radiation awareness in the metal recycling industry.	<ul style="list-style-type: none"> • Mr. Gangel said that the discussion point was kept on the agenda to highlight the fact that HAZCOM Committee raised awareness in the entire industry in terms of the risks posed by radiation and other hazardous items via various communication methods. • The secretariat reported that an authority holder of two redundant sources was recently assisted with information on service providers for the transport of such sources to Necsa for decommissioning. 	
6.13 Temporary storage of orphaned sources on unlicensed premises.	<ul style="list-style-type: none"> • Mr. Gangel said that the discussion point related to orphaned sources that had to be stored until a response was forthcoming from the first responders and until the final removal from site of orphaned radioactive sources by Necsa. • Mr Gangel said that the storage of orphaned sources on site was in contradiction of waste management licences issued for those sites and it meant that the orphaned sources were also in the public domain. • It was noted that the Ra-226 source detected at Cape Gate on 2 September 2020 was stored by Cape Gate until it was removed from site by Necsa on 15 September 2020. 	
7 General		
7.1 HAZCOM position paper on orphaned sources	<ul style="list-style-type: none"> • The secretariat reported that there was a request from the South African Iron and Steel Institute's secretariat that committees under its auspices prepare position papers on pertinent issues that fall within the scope of the committees in order to present an consolidated industry viewpoint for these matters to be raised with the relevant authorities. • Mr. Gangel said that a HAZCOM position paper on orphaned sources was drafted for this purpose and requested that HAZCOM representatives from the metal recycling industry 	Metal recycling industry representatives to submit comments on position paper.

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	<p>peruse the draft and please submit comments.</p> <ul style="list-style-type: none">• Mr. Gangel said that the draft appeared to cover all elements the HAZCOM committee was concerned with in terms of orphaned radioactive sources.	
7.2 List of NNR authorisations granted.	<ul style="list-style-type: none">• On a question by Mr. Labuschagne for a list of all metal scrap dealers with a license to transport contaminated metal scrap, Mr. Pheto reported that the list of authorisations granted by the NNR would be available on the NNR website and the NNR annual report.• <i>(Secretary's note: The NNR list was forwarded to Mr. Labuschagne on 24 November 2020.)</i>	
8 Date of next meeting.	<ul style="list-style-type: none">• It was agreed that the next meeting of the HAZCOM Committee would be scheduled for 13:00, Tuesday, 23 February 2021 via an online Microsoft Teams meeting.• Mr. Gangel requested that proposed dates for the remainder of 2021 also be included.• <i>(Secretary's note: Proposed dates for the remainder of 2021: 13H00 on 25 May 2021, 24 August 2021 and 23 November 2021.</i>	
9 Adjournment	<ul style="list-style-type: none">• Being there no further business, Mr. Gangel thanked representatives for their attendance and contributions to the meeting and wished all a safe festive period.• The meeting was adjourned at 13:53.	

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