

Pakistan Nuclear Regulatory Authority

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Subject: <u>Guidance on Inventory Management of SRS and RGs and Process for Lock and Seal</u> <u>Activities</u>

It is emphasized that the data of radiation facilities needs to be kept updated as soon as it is changed/updated (e.g., changes in the operational status, change in inventories i.e., addition or deletion of RGs as per inspection reports or licensee submissions).

- 2. In this regard, the following guidelines have been devised to be followed by respective Regions and Inspectorates:
 - i. Properly fill-in the PIRs and write additional comments, if so required (e.g., hindrance in inspection, concealing information, unregistered RGs or inconsistency in the inventory). For this purpose, additional pages/sheets may be attached to the Instant PIRs, if needed;
 - ii. Keep the database of RFs updated with all relevant data as soon as it changes, either through information received from Licensee or identified during inspections;
 - iii. Review the latest PIRs already issued to X-ray facilities and ensure that the Inventory of RGs in the database is according to the PIRs;
 - iv. Ensure that the data of RGs other than those used in radiology (e.g., LINACs, XRD, XRF, Baggage Scanner, Human Body Scanners etc.) is also entered in the database as practiced by RNSD-III;
 - v. Immediately start adding the CNIC data of owners and or applicants of RFs to the database.
- 3. Furthermore, the following elaborations are being made for proper implementation of "Procedure for Lock and Seal of Radiation Facilities (PNRA-WP-042)":
 - i. The list of facilities selected for lock and seal activity along with agreed date of hearing and summary sheet of each facility should be shared with DG(I&E) office prior to conduct of activity;
 - ii. The list finalized for Lock & Seal activities should be verified for existence of facility and RGs before the involvement of law enforcement agencies or district management;
 - iii. A comprehensive and clear case (w.r.t Inventory of RGs, Fee Calculations, Contact Information etc.) should be presented to DG (I&E) and OLA for conduct of hearing proceedings (preferably before or) immediately after Lock & Seal activity;
 - iv. Consequences of breakage of PNRA Seal should be clearly communicated to the violator including lodging of FIR under Section 186 PPC;
 - v. In case of breakage of PNRA Seal by facilities, FIR along with re-sealing of the facility should be executed;
 - vi. The similar procedure of seal should be followed for resealing of the facilities;
 - vii. After issuance of hearing decision, the facilities sealed by PNRA should be de-sealed in consultation with DG(I&E) either by PNRA inspectors himself or authority letter may be issued to the licensee to de-seal the facility;
- 4. Moreover, to verify the data of SRS at DG (I&E) office before the issuance of annual SRS Report, Regions are also required to **submit the duly filled/signed latest SRS Inventories of all RFs using SRS**, as soon as possible; but, not later than December 26, 2022.

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