

Radiation Safety

Business Name:		ABN:	
Business Address:			
Contact Person:	Phone:	Email:	

THIS RISK ASSESSMENT IS APPROVED BY THE PCBU ON THIS PROJECT

Under the Work Health and Safety Regulation (WHS Regulation), a person conducting a business or undertaking (PCBU) is required to ensure that a RISK ASSESSMENT is prepared before the proposed work starts.

Full Name:		
Signature:	Title:	Date:

CLIENT OR PRINCIPAL CONTRACTOR DETAILS

Client:	SCOPE OF WORKS
Project Name:	
Project Address:	
Project Manager:	
Contact Phone:	
Date Risk Assessment supplied to Project Manager:	



RISK MATRIX									
LIKELIHOOD	INSIGNIFICANT	MINOR	MODERATE	MAJOR	CATASTROPHIC	SCORE	ACTION	HIERARCHY OF CONTROLS	
ALMOST CERTAIN	3 HIGH	3 HIGH	4 ACUTE	4 ACUTE	4 ACUTE			Elimination Remove the hazard.	
LIKELY	2 MODERATE	3 HIGH	3 HIGH	4 ACUTE	4 ACUTE	4A ACUTE	DO NOT PROCEED	Substitution Replace the hazard.	
POSSIBLE	1 LOW	2 MODERATE	3 HIGH	4 ACUTE	4 ACUTE	3H HIGH	Review before work starts.	Isolation Isolate People from the hazard	
UNLIKELY	1 LOW	1 LOW	2 MODERATE	3 HIGH	4 ACUTE	2M MODERATE	Ensure control measures in place.	Engineering Isolate the hazard	
RARE	1 LOW	1 LOW	2 MODERATE	3 HIGH	3 HIGH	1L LOW	Monitor and keep records.	Administrative Change PPE	

Risk Rating & Required Action:	
4A	Stop work. The risk is intolerable. Eliminate the hazard or redesign the activity before proceeding. A Safe Work Method Statement (SWMS) or higher-level authorisation is required.
3H	Review and approve additional controls before task starts. Senior supervisor sign-off needed.
2M	Ensure all nominated controls are in place and effective. Proceed with caution; monitor conditions.
1L	Proceed, following standard operating procedures. Monitor and keep records.

Consequence Scale:			
Consequence	People (injury/illness)	Project / Assets	Compliance / Reputation
Catastrophic	Fatality or permanent total disability	project shutdown	Significant regulator intervention; criminal prosecution
Major	Serious injury/illness (hospital > 5 days)	critical delay	Improvement notice; major media coverage
Moderate	Medical-treatment injury; lost-time > 1 day	moderate delay	Minor breach; adverse client comment
Minor	First-aid only, no lost time	negligible delay	Isolated non-conformance
Insignificant	No injury	no schedule impact	Deviation caught and corrected on site

Notes on Hierarchy of Controls:
Remember to apply controls in the preferred order shown by the coloured pyramid:

1. **Eliminate**
2. **Substitute**
3. **Isolate**
4. **Engineering**
5. **Administrative**
6. **PPE**

Always document **why** a lower-order control is accepted if elimination or substitution is not reasonably practicable.

aligned with Safe Work Australia's Managing the risk of fatigue at work (2023) and ISO 45001:2018 clauses 6–8.

JOB STEP	POTENTIAL HAZARDS	IR	CONTROL MEASURES	RR
SPECIFIC WORK STEPS	HAZARDS THAT MAY ARISE	INITIAL RISK	SPECIFIC MEASURES TO BE PUT IN PLACE TO ELIMINATE OR CONTROL THE RISKS	RESIDUAL RISK
1. Governance, Legislative Compliance & Licensing	<ul style="list-style-type: none"> Failure to identify and comply with WHS Act 2011, WHS Regulation and state/territory radiation control legislation Absence of a formal radiation management plan covering ionising and non-ionising radiation sources Inadequate or lapsed radiation licences for company, facilities, radiation safety officers and operators Unclear allocation of radiation safety roles, responsibilities and accountabilities at senior management level Failure to integrate radiation safety into the organisation's WHS management system and due diligence processes Poor change-management processes when new radiation technologies, nuclear density gauges or industrial radiography equipment are introduced Inadequate review of compliance following legislative or standards updates (ARPANSA codes, AS/NZS standards) 	4A	<ul style="list-style-type: none"> Establish and maintain a documented Radiation Management System aligned to WHS Act 2011, WHS Regulation and relevant state/territory radiation legislation and ARPANSA codes of practice Appoint a competent Radiation Safety Officer (RSO) with documented authority and direct reporting line to senior management Maintain a compliance register of all required radiation licences, registrations, approvals and permits, including for industrial radiography, nuclear density gauges and densometers Implement documented governance procedure requiring regular legal compliance reviews and gap analyses by a suitably qualified radiation consultant Integrate radiation safety into the organisation's WHS policy, risk management framework and safety objectives with board level oversight Establish a formal management of change procedure for introduction, modification or decommissioning of any ionising or non-ionising radiation source Schedule annual internal audits and periodic external audits of the Radiation Management System, with corrective actions tracked to completion Ensure participation in industry forums and subscription to regulatory updates to maintain current knowledge of radiation safety obligations 	3H
2. Radiation Risk Management & Planning	<ul style="list-style-type: none"> Inadequate identification of tasks involving exposure to ionising and non-ionising radiation (e.g. industrial radiography, nuclear density gauge utilisation, work in radiation areas) No documented radiation risk assessments for new projects, new equipment or changes to usage patterns Failure to consider cumulative radiation dose for workers undertaking multiple tasks or working near multiple sources Insufficient assessment of exposure to electromagnetic fields (EMF) from non-ionising radiation sources Over-reliance on PPE rather than higher-order controls for radiation exposure mitigation 	4A	<ul style="list-style-type: none"> Develop formal radiation risk assessment procedures that distinguish between system-level risks and task-level SWMS requirements Require documented, activity-specific radiation risk assessments for all operations using radioactive substances, nuclear densometers, industrial radiography or EMF-generating equipment Incorporate the principles of justification, optimisation (ALARA/ALARP) and dose limitation into all planning processes Mandate pre-job radiation planning meetings for higher-risk tasks such as industrial radiography work and work in designated radiation areas Use dose modelling tools and expert advice to predict exposures for complex tasks or cumulative exposure scenarios Integrate radiation risk assessments with broader project risk registers and HSE planning documentation Review and update radiation risk assessments on a defined schedule and after incidents, near misses or significant process changes 	2M

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	<ul style="list-style-type: none"> Poor integration of radiation controls with other high-risk work (e.g. confined spaces, remote locations, construction activities) 			
3. Inventory, Classification & Source Security	<ul style="list-style-type: none"> Incomplete or inaccurate inventory of radioactive sources, X-ray equipment, nuclear density gauges and EMF-emitting devices Unclear source ownership, custodianship and chain-of-responsibility, particularly for mobile industrial radiography units Loss, theft or unauthorised removal of sealed sources or gauges leading to uncontrolled public exposure Improper storage of radioactive substances, including inadequate shielding, segregation and security Failure to classify radiation areas and controlled zones based on potential exposure levels Inadequate control of temporary or hired radiation sources on remote or client sites 	4A	<ul style="list-style-type: none"> Maintain a centralised, controlled inventory system for all ionising and non-ionising radiation sources, including serial numbers, activity, location and status Define and document nominated custodians for each radiation source and industrial radiography unit with clear responsibilities Implement physical and procedural security controls for radioactive sources, including locked storage, access control and key management systems Classify and signpost radiation areas and controlled zones in accordance with relevant Australian standards and AR/NSA codes Introduce a permit-to-move system for the transport or relocation of nuclear density gauges, densometers and other mobile sources Conduct regular stocktakes and reconciliations of all radiation sources, with discrepancies escalated immediately Implement incident response protocols for loss, theft or suspected tampering with any radiation source, including regulatory notification 	2M
4. Engineering Controls & Facility Design	<ul style="list-style-type: none"> Inadequate shielding design for fixed radiography rooms, radiation laboratories or gauge installations Poor layout resulting in unnecessary occupancy or through-traffic in higher dose-rate areas Failure of interlocks, warning systems or shutters on X-ray equipment and nuclear density gauges Insufficient segregation between radiation sources and general work areas or public access zones Lack of engineered controls for EMF exposure from non-ionising radiation sources 	4A	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>	2M

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	<ul style="list-style-type: none"> Inadequate provision for safe storage, transport and docking of mobile radiation sources 			
5. Radiation Monitoring, Dosimetry & Exposure Tracking	<ul style="list-style-type: none"> Lack of systematic monitoring of ionising radiation levels in work areas and controlled zones Failure to issue or correctly manage personal dosimeters for workers who handle radioactive substances or perform industrial radiography work Inadequate monitoring of EMF for workers using or working near non-ionising radiation sources Delayed or poor-quality analysis of dosimetry results leading to unrecognised over-exposures No formal process for investigating elevated or anomalous dose readings Inaccurate or incomplete dose records for employees, contractors and visiting workers 	4A	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>	2M
6. Procurement, Selection & Maintenance of Radiation Equipment	<ul style="list-style-type: none"> Purchase of radiation equipment or radioactive sources without appropriate safety features or certification Inadequate technical specifications for shielding, interlocks and safety systems at the procurement stage Lack of preventative maintenance and calibration programs for nuclear density gauges, industrial radiography units and monitoring instruments Use of defective or out-of-calibration survey meters and dosimetry readers leading to incorrect exposure assessments Poor lifecycle management, including unsafe storage of obsolete sources or delayed decommissioning 	3H	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>	1L

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7. Training, Competency & Authorisation of Workers	<ul style="list-style-type: none"> Workers handling radioactive substances or operating industrial radiography equipment without appropriate training or licences Lack of competency assessment for personnel using nuclear density gauges, densometers or working in controlled radiation areas Inadequate awareness of EMF risks and controls for workers near non-ionising radiation sources No formal authorisation process for radiation work, leading to unqualified personnel accessing radiation areas Failure to provide refresher training and updates following regulatory or procedural changes 	4A	[REDACTED]	2M
8. Work Authorisation, Access Control & Permit Systems	<ul style="list-style-type: none"> Uncontrolled access to radiation area by untrained or unauthorised persons Commencement of industrial radiography work or high-dose tasks without formal approval or coordination Failure to coordinate simultaneous operations (SIMOPS) where other workers are present near active radiation sources Inadequate lock-out or tag-out procedures for radiation-emitting equipment during maintenance or non-use Temporary works or construction activities altering shielding effectiveness or access pathways without review 	3H	[REDACTED]	1L
9. Contractor, Supplier & Client Interface Management	<ul style="list-style-type: none"> Contractor industrial radiography teams operating under inconsistent or lower radiation safety standards Suppliers of nuclear density gauges or other devices failing to provide adequate technical and safety information 	3H	[REDACTED]	2M

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	<ul style="list-style-type: none"> Misalignment between client site requirements and the organisation's radiation management procedures Poor communication of radiation hazards, controlled areas and exposure limits to visiting workers Inadequate oversight of third-party maintenance or calibration activities on radiation sources 		[REDACTED]	
10. Health Surveillance, Fitness for Work & Dose Management	<ul style="list-style-type: none"> Lack of health surveillance for designated radiation workers with potential for significant exposure Failure to identify individual workers approaching dose constraints or regulatory dose limits Inadequate assessment of medical conditions, pregnancy or medications that may affect radiation risk Poor integration of fall management and roster design for workers undertaking industrial radiography at night or in remote areas Absence of procedures for temporary removal from radiation work following elevated dose or medical advice 		[REDACTED]	2M
11. Emergency Preparedness, Incident Response & Reporting	<ul style="list-style-type: none"> Unpreparedness for radiation emergencies such as source loss, damage, fire, vehicle accidents involving gauges, or uncontrolled exposure events Lack of clear criteria for classifying and escalating radiation incidents and near misses Inadequate training and drills for emergency response teams regarding radiation hazards and contamination control 	4A	[REDACTED]	2M

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	<ul style="list-style-type: none"> Failure to notify regulators and affected persons in accordance with statutory requirements after a radiation incident Poor post-incident investigation leading to recurrence of systemic failures 		[REDACTED]	
12. Information, Consultation & Worker Engagement	<ul style="list-style-type: none"> Workers not adequately informed about radiation risks, exposure pathways and available control measures Limited consultation with health and safety representatives (HSRs) on radiation safety decisions and changes Lack of clear communication about radiation signage, area classifications and access restrictions Worker reluctance to report radiation concerns, near misses or early warning signs of system failure Inadequate involvement of workers in the review of radiation procedures and risk assessments 	3H	[REDACTED]	1L
13. Documentation, Records Management & Audit	<ul style="list-style-type: none"> Incomplete or outdated radiation procedures, manuals and work instructions Poor control of critical records such as licences, dosimetry reports, maintenance logs and calibration certificates Inconsistent document versions across multiple sites leading to confusion and non-compliance Lack of systematic internal audit of radiation safety practices and records Inability to demonstrate compliance during regulatory inspections or client audits 	3H	[REDACTED]	1L
14. Remote Operations, Transport & Field Work with Radiation Sources	<ul style="list-style-type: none"> Inadequate control of radiation exposure when conducting industrial radiography or gauge use in remote or temporary locations 	4A	[REDACTED]	2M

SAMPLE

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	<ul style="list-style-type: none"> • Transport of radioactive sources without compliant packaging, labelling and security arrangements • Loss or damage to nuclear density gauges or densometers during vehicle accidents or unsecured transport • Limited communication and emergency support for field crews working with radiation sources in isolated areas • Failure to conduct site-specific assessments for EMF and radiation when deploying temporary equipment on client sites 		<p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>	

SAMPLE

EMERGENCY RESPONSE – CALL 000 FOR EMERGENCIES

Ensure to have an Emergency Management Plan in place as well as adequate numbers of trained first aid staff with easy access to fully stocked first aid kits, rescue equipment, material safety data sheets, adequate access to emergency communication equipment and fire-fighting equipment suitable for all classes of fire and ignition sources.

LEGISLATIVE REFERENCES

RELEVANT LEGISLATION AND CODES OF PRACTICE. DELETE THE LEGISLATIVE REFERENCES FOR ANY STATE THAT ARE NOT APPLICABLE

Queensland & Australian Capital Territory

Work Health and Safety Act 2011
 Work Health and Safety Regulations 2011
 Legislation QLD: <https://www.worksafe.qld.gov.au/laws-and-compliance/work-health-and-safety-laws>
 Codes of Practice QLD: <https://www.worksafe.qld.gov.au/laws-and-compliance/codes-of-practice>
 Legislation ACT: <https://www.worksafe.act.gov.au/laws-and-compliance/acts-and-regulations>
 Codes of Practice ACT: <https://www.worksafe.act.gov.au/laws-and-compliance/codes-of-practice>

Victoria

Occupational Health and Safety Act 2004
 Occupational Health and Safety Regulations 2017
 Legislation VIC: <https://www.worksafe.vic.gov.au/occupational-health-and-safety-act-and-regulations>
 Codes of Practice VIC: <https://www.worksafe.vic.gov.au/compliance-codes-and-codes-practice>

New South Wales

Work Health and Safety Act 2011
 Work Health and Safety Regulations 2025
 Legislation NSW: <https://www.safework.nsw.gov.au/legal-obligations/legislation>
 Codes of Practice NSW: <https://www.safework.nsw.gov.au/resource-library/lis>

Western Australia

Work Health and Safety Act 2020
 Work Health and Safety Regulations 2022
 Legislation Western Australia: <https://www.commerce.wa.gov.au/worksafe/legislation>
 Codes of Practice WA: <https://www.commerce.wa.gov.au/worksafe/codes-practice>

Northern Territory

Work Health and Safety (National Uniform Legislation) Act 2011
 Work Health and Safety (National Uniform Legislation) Regulation 2011
 Legislation NT: <https://worksafe.nt.gov.au/laws-and-compliance/workplace-safety-laws>
 Codes of Practice NT: <https://worksafe.nt.gov.au/laws-and-compliance/codes-of-practice>

Safe Work Australia Links

Law and Regulation (All States): <https://www.safeworkaustralia.gov.au/law-and-regulation>
 Model Codes of Practice: <https://www.safeworkaustralia.gov.au/resources-publications/model-codes-of-practice>

South Australia

Work Health and Safety Act 2012 (SA)
 Work Health and Safety Regulations 2012 (SA)
 Legislation for SA: <https://www.safework.sa.gov.au/resources/legislation>
 Codes of Practice for SA: <https://www.safework.sa.gov.au/workplaces/codes-of-practice#COPs>

Model Codes of Practice

- Managing noise and preventing hearing loss at work
- Confined spaces
- Labelling of workplace hazardous chemicals
- Managing risks of hazardous chemicals in the workplace
- Welding processes
- First aid in the workplace
- Managing the risk of falls at workplaces
- Hazardous manual tasks
- Managing the risk of falls in housing construction
- Managing electrical risks in the workplace
- Demolition work
- Excavation work
- Work health and safety consultation, cooperation and coordination
- Managing the work environment and facilities
- How to manage work health and safety risks
- Managing risks of plant in the workplace
- Construction work

Tasmania

Work Health and Safety Act 2012
 Work Health and Safety (Transitional and Consequential Provisions) Act 2012
 Work Health and Safety Regulations 2012
 Work Health and Safety (Transitional) Regulations 2012
 Legislation for TAS: <https://worksafe.tas.gov.au/topics/laws-and-compliance/acts-and-regulations>
 Codes of Practice for TAS: <https://worksafe.tas.gov.au/topics/laws-and-compliance/codes-of-practice>

Details of permits, licenses or access required by regulatory bodies (add or delete as required):

- Permits from local council
- Authorisation to commence work
- Any required documents.