



**Radiological Protection Institute of Ireland**  
An Institiúid Éireannach um Chosaint Radíolaíoch

PMCG  
Meet up  
with CEO.

5<sup>th</sup> September, 2011

Mr Garrett Blaney  
Commissioner  
Commission for Energy Regulation  
The Exchange, Belgard Square North  
Tallaght, Dublin 14.

**RE: Consultation Paper on High Level Design of Petroleum Safety Framework**

Dear Mr Blaney

Dr McGarry asked me to review your correspondence of the 3<sup>rd</sup> August and to respond on behalf of the RPII accordingly. It may be of interest to note as the Petroleum Safety Framework is further developed in the area of regulatory cooperation and also when considering the potential hazards associated with exploration that the RPII is actively involved in regulating this sector from a health, safety and security perspective.

Specifically there are currently five companies licensed by the RPII that use radioactive sources in the offshore oil and gas industry. Typical sources used are Am-241/Be and Cs-137 for borehole and well logging. While the use of such sources in Irish waters is infrequent, the companies maintain their licence should the need arise to use sources at short notice. RPII also inspects the sector and in 2010 two offshore inspections were undertaken. As you will be aware the health and safety training requirements for such inspectors are extensive and include the Basic Offshore Safety Induction & Emergency Training certificate (BOSIET) and the UK Offshore Medical and the Minimum Industry Safety Training certificate (MIST). Currently two RPII inspectors meet these requirements.

There have been no reported or detected incidents with radioactive sources in the sector in Ireland to date. However, it is worth noting that incidents have occurred in the UK, a recent incident resulted in rig staff being exposed to radiation and the company was prosecuted by the UK's HSE and fined £300,000.

The RPII is committed to the principle of ensuring that the regulatory burden on all such undertakings is minimised to an appropriate level and welcomes the opportunity of working with other regulatory agencies to ensure that there is no unnecessary duplication of effort or conflicting requirements. To this end, I would be very pleased to meet and discuss in more detail the role and responsibilities of the RPII in regulating this sector should that be of interest as you develop the framework further.

Dr Tom Ryan  
Director  
Regulation and Information Management

CC Dr Ann McGarry CEO