

From: [REDACTED]
Sent: Wednesday, November 22, 2023 6:10 PM
To: Committee, Public Works (REPS) <pwc@aph.gov.au>
Subject: Submission: Australian Nuclear Science and Technology Organisation — Nuclear Medicine Facility project

To the committee,

I'm all for more jobs involving bunny suits.

The ANTSO submission does not present a strong case for the development by failing to discuss the need for a replacement for Building 54. It does not mention that Building 54 was built in 1959 and is as old as HIFAR -the original decommissioned reactor that has been replaced by OPAL. Building 23's maintenance has been affected by neglect including funding shortfalls. Fund existing maintenance then expand capacity.

The Auditor-General Report No. 26 of 2021–22, *Australian Nuclear Science and Technology Organisation's Management of Nuclear Medicine Assets*, Conclusion 17 identified a lack of training of auditors in regards to nuclear asset disposal. Recommendations were made and further discussed in 3.42 and Recommendation no.2. It is global standard practice to 'delay and decay' assets at nuclear facilities. Nuclear infrastructure is an asset until it's 50 years old then it becomes moonscape no-man's land. This lifespan shortens if maintenance is not performed and risk mitigation is poor. In ANTSO's case, they have had difficulty obtaining authority over the site via the required 'Possess or Control' licence and the lack of a national waste facility. It's not a vacant rented office in the city but was treated as such by the auditor. This reflects on the importance of separating the office and administrative building from the manufacturing section. The offices do not need to be in close proximity to the nuclear reactor as an important decommissioning concern. The report identifies operational funding shortfalls that have resulted in the 'mitigation strategy' being considered to delay maintenance to the OPAL reactor. ARPNSA *R19/08620* states that some maintenance tasks aren't important for safety confusing the issue. Report 26 still specifies that high priority maintenance tasks are often delayed. This must be addressed before expanding capacity.

I would like more details regarding the considerations for plant equipment loadout access, floor loading capacity and drainage plumbing. The Statement of Evidence from ANTSO describes a modular almost hotswappable capability of the manufacturing lines in the building such that the facility can be easily reconfigured according to changing requirements. The architectural model suggests such a feat would be more like moving a piano up a spiral staircase limiting such described serviceability.

It is a beautiful design but it may need to be more brutally industrial. It's a pharmaceutical clean lab so axe the windows. It will only make it harder to work with photosensitive pharmaceuticals. It's right next to a nuclear power plant that must be operating to supply materials so axe the solar panels to save on low level radioactive ewaste. Add more than 8 parking spaces for the massive administration annex if it's maintained. Axe the office annex so that the building is accessible from ground level to allow for direct loading to the factory floor at ground level. How much manufacturing and warehouse/plant room space is lost to elevator and stairway footprint?

I also have concerns regarding the hiring practices of the nuclear facilities. The report into the spill at building 23 was attributed in *Statement of Reasons: Decision by the CEO of ARPNSA to amend Facility Licence F03091*, 27 March 2020, to a, "lack of awareness of the hazards associated with production and handling of high-activity Mo-99 products." What is the minimum qualification required to perform hotlab procedures? Can we agree that all staff members

should have a minimum 4 year degree in a relevant specialty such as pharmacy or nuclear physics and that staff manufacturing pharmaceutical products should understand what they are doing?

Robert Heron

