

**MEMORANDUM ON NUCLEAR SAFETY, SECURITY AND  
SAFEGUARD BILL, 2019 (SB19)**

*Submitted to:*

**The Senate Committee on Petroleum Resources (Upstream)**

*By:*

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## **INTRODUCTION**

This submission is prepared by the Institute of Non-Destructive Testing, Nigeria (INDTN) to facilitate the process of enacting the Nuclear Safety, Security and Safeguard Bill, 2019 (SB 19).

The Institute of Non-Destructive Testing, Nigeria (INDTN) is the professional body for Non-Destructive Testing (NDT) and Condition Monitoring practitioners in Nigeria. INDTN was established to promote the advancement of the science, technology and practice of non-destructive testing, condition monitoring and related technologies.

By virtue of Regulation 5(5) of the Boiler and Pressure Vessel Regulation, 2018, the INDTN is empowered to issue guidelines on the Education, Training, Certification and Practice of Non-Destructive Testing in Nigeria.

The main goal of INDTN is to drive human capital development in non-destructive testing, align NDT qualification system in Nigeria with international standards, track of NDT capabilities and provide firm control and discipline in the practice of NDT in Nigeria.

Non-destructive Testing (NDT) is an essential element of quality assurance in various industries and the application of radioisotope and radiation technology is one of the several NDT methods deployed to assess quality, safety and integrity of components and structures.

## **CASE FOR NEW INCLUSION**

This submission amongst other things addresses the need for the inclusion of a specific clause to address the qualification and practice of industrial radiography in the Bill.

For the purpose of safety and security in industrial radiography as recommended by the International Atomic Energy Agency (IAEA) Safety Standard SSG 11, appropriate means is required to address:

- Lack of adequate contents on radiation safety in the certification scheme for industrial radiographer
- Lack of performance monitoring system for industrial radiographers and;
- Lack of appropriate means to regulate contract radiographers

The proposed clause inclusion could be under the sub-heading “Industrial Application of Radiation”, which was clause 50 in the table of content, but is conspicuously missing from the body of the Bill.

INDTN would appreciate the re-introduction of this clause into the Bill and would recommend that it reads as follows:

*Industrial Application of Radiation*

*(1) The Authority shall-*

- (a) require that industrial radiographers fulfil the requirements for education, training, and qualification in relevant regulations and guidelines;*
- (b) ensure that industrial radiographers meet the requirements for education, training and competence in radiation protection as may be prescribed by the Authority, and*
- (c) require that industrial radiographers are named in the registry maintained and updated by the relevant professional bodies.*

**OTHER SUGGESTIONS ON THE BILL**

As part of contribution to improve the quality of the Bill, INDTN wish to make the following observations:

1. The table of content should be harmonised with the clauses in the Bill. The table of content has 110 clauses, while the body of the Bill contains 108 clauses. Clause 28 – Fund of the Institute and clause 50 – Industrial Application of Radiation are missing from the body of the Bill.
2. PART VII – Kindly delete the word “Research” from the title, so the title would be read as – National Institute for Nuclear Safety and Radiation Protection
3. Clause 46 (2) (a) – INDTN suggests that reference should be made to both national and international standards. So that the statement should read thus:
  - (a) National and International standards.*

Kindly in the circumstance amend accordingly, whilst thanking the Committee for the opportunity provided to air our respective views as Institute of Non-destructive Testing, Nigeria.

For: Institute of Non-Destructive Testing, Nigeria



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