

Koninklijk Besluit 17/02/2023: Industriële radiografie.

As service providers of industrial radiography in Belgium, we want to inform you about the new obligations according to the Royal Decree (KB) of 17/02/2023, industrial radiography, which will come into effect on April 3, 2024, and, more importantly, how we, as representatives of this sector, will apply the regulations.

As many of us are aware, there are specific risks associated with working with ionizing radiation. The legislator has identified these risks and prescribed obligations with the aim of minimizing them. In the run-up to the new legislation, we, as service providers, have established a working group with the original goal of informing the legislator, but have since evolved into a coordinating body where we extensively discuss the new regulations and assess them in light of our practical knowledge. A uniform approach has been agreed upon to ensure that our future collaboration with you as a client complies with the rules of the art, and any potential obstacles to the actual commencement of radiographic work can be addressed and resolved.

1 Justification

Before we can proceed with radiography, you as a client must provide us with a written justification for each type of task (not every intervention within the same task). The justification must be prepared for both the NDT technique and the location where the examination will take place.

1.1 Technique:

Om Radiografie als techniek te rechtvaardigen zien wij de volgende scenario's zich afspelen.

- a. Industrial radiography is prescribed by a standard and therefore justified.
- b. Volumetric examination may be prescribed. However, this does not automatically justify radiography, as alternative techniques such as ultrasonic methods may be preferable and so could be preferred.
- c. When radiography is requested in the absence of a standard or when higher requirements are imposed than a current standard, the justification will be supplemented with a risk analysis that takes into account the consequences of undetected manufacturing defects.

1.2 Location:

The new regulations describe three locations where radiographic examination can take place: the bunker, irradiation infrastructure, and the construction site.

- a. A **Bunker**, approved by an Accredited Expert, is preferred for all radiation work. All NDT firms like ours have bunkers. Pieces with dimensions fitting within 1m³ and <500 kg must always be processed in a bunker. No exceptions will be made.
- b. An **irradiation infrastructure** will need to be provided by most of you for pieces that cannot be processed in a bunker. A risk analysis will be prepared by you and the NDT firm, and there must be formal approval of the infrastructure by an Accredited Expert.
- c. Work on a construction site will only take place when the above criteria are not feasible. A risk analysis will be prepared by you and the NDT firm.

In the email you have received from us, you can also find a flowchart. Hopefully, this will guide you in what we, the NDT firm, consider as valid justification for the location and the accompanying burden of proof to proceed with radiography as a technique.

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2 Responsibilities

The Royal Decree initially describes the various responsibilities of the parties involved in taking industrial radiographs. You, as a customer, are jointly responsible for contributing to a safe working environment and will have to go through the necessary processes with the NDT firm before work begins. You, as a customer, are responsible for the following:

- a. Ensuring that the NDT firm is licensed to perform radiographic work.
- b. Informing and enforcing safety measures for your own staff and third parties present on the site during radiographic work.
- c. No time constraints or other measures shall be imposed on the NDT firm that prevent them from working safely.
- d. One or more contact persons will be designated, who, upon arrival, will go over the information provided with the industrial radiologist so that they can perform the work safely. These contact persons will always be available throughout the duration of the work and will act as a liaison with the responsible employer of the site or construction site.
- e. If industrial radiography must take place in public places, you, as the customer, will inform the mayor of the relevant city/village in writing at least 15 days before the work is carried out. This notification includes a proposal for safety measures to be taken. This can only be deviated from in the case of accidental or incidental circumstances.
- f. Correct and complete information about the work to be performed must be provided to the NDT firm at least 24 hours in advance, so that the NDT party has sufficient time to prepare for the work. This should be submitted in the form of a request, including at least the following information:
 - i. Contactperson
 - ii. location
 - iii. quantities
 - iv. object dimensions
 - v. standard and related execution and acceptance criteria

If it turns out that the submitted request and what needs to be processed do not match, only the originally requested work will be carried out, or it will not take place.

3 Conclusion

We, NDT firms, strongly recommend reviewing the information regarding 'Industrial Radiography' on the website of the FANC: [Industriële radiografie | FANC - Federaal Agentschap voor Nucleaire Controle \(fgov.be\)](https://www.fgov.be/nl/onderwerpen/industriele-radiografie)

If you have any questions, please feel free to contact us. Upon request, we can provide you with a justification template, a location risk analysis, and a request template. We look forward to continuing our collaboration and hope to create a safe working environment for all parties involved.

Kind regards,

Names of the parties in the industrial radiography working group,

