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MEASURES TO STRENGTHEN INTERNATIONAL CO-OPERATION IN NUCLEAR, RADIATION, TRANSPORT AND WASTE SAFETY

IMPLEMENTATION OF THE REVISED ACTION PLAN FOR THE SAFETY AND SECURITY OF RADIATION SOURCES

DRAFT REVISED CODE OF CONDUCT ON THE SAFETY AND SECURITY OF RADIOACTIVE SOURCES

1. One of the major findings of the International Conference on the Safety of Radiation Sources and the Security of Radioactive Materials held in Dijon, France, from 14 to 18 September 1998 was that "Further efforts should be made to investigate whether international undertakings concerned with the effective operation of national regulatory control systems [for radiation sources and radioactive materials] and attracting broad adherence could be formulated." On 25 September 1998, the General Conference, in resolution GC(42)/RES/12, requested the Secretariat to prepare, for the Board's consideration, "a report on (i) how national systems for ensuring the safety of radiation sources and the security of radioactive materials can be operated at a high level of effectiveness and (ii) whether international undertakings concerned with the effective operation of such systems and attracting broad adherence could be formulated".

2. On 20 September 1999, the Board approved an *Action Plan for the Safety of Radiation Sources and the Security of Radioactive Materials* proposed by the Secretariat in document GOV/1999/45-GC(43)/10. One of the envisaged actions was "to initiate a meeting of technical and legal experts for exploratory discussions relating to an international undertaking in the area of the safety of radiation sources and the security of radioactive materials".

3. On 11 September 2000, the Board took note of the *Code of Conduct on the Safety and Security of Radioactive Sources* which had been prepared within the framework of the *Action Plan*. In doing so, it requested the Director General to organize consultations on decisions which the Agency's policy-making organs might wish to take, in the light of the report

(contained in Attachment 7 to document GOV/2002/34-GC(44)/7) of the Chairman of the Open-ended Meeting of Technical and Legal Experts which had produced the final draft text of the *Code of Conduct*, and to make recommendations thereon to the Board. On 22 September 2000, in resolution GC(44)/RES/11, the General Conference invited Member States to take note of the *Code of Conduct* and to consider, as appropriate, means of ensuring its wide application.[1]

4. On 10 September 2001, the Board requested the Secretariat to implement the *Revised Action Plan for the Safety and Security of Radiation Sources* contained in the Attachment to document GOV/2001/29-GC(45)/12, subject to the availability of resources, and, as appropriate, to inform the Board of progress made in its implementation. The *Revised Action Plan* envisaged consultations on the effectiveness of the *Code of Conduct*.

5. From 19 to 23 August 2002, a Technical Committee chaired by Mr. S. McIntosh (Australia) and consisting of 21 technical experts from 17 Member States and two international organizations considered the effectiveness of the *Code of Conduct*. This meeting was foreshadowed in paragraph 15 of attachment 2 to GOV/2002/35-GC(46)/11. The report of the Chairman, to which a draft revised *Code of Conduct on the Safety and Security of Radioactive Sources* is attached, is contained in the Annex to this document and is provided for information.

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[1] The *Code of Conduct on the Safety and Security of Radioactive Sources* was published by the Agency in March 2001 with the symbol IAEA/CODEOC/2001.

Technical Meeting to consider the

effectiveness of the Code of Conduct

on the Safety and Security of Radioactive Sources

Vienna, 19-23 August 2002

Report of the Chairman

1. An open-ended meeting of technical experts to consider the effectiveness of the Code of Conduct on the Safety and Security of Radioactive Sources met from 19 to 23 August 2002 at the IAEA Headquarters in Vienna under the chairmanship of Mr S. McIntosh (Australia). The meeting was attended by representatives from 17 Member States (Argentina, Australia, Canada, Ethiopia, Finland, Germany, India, Japan, Norway, Portugal, the Russian Federation, Slovakia, South Africa, Turkey, Ukraine, the United Kingdom and the United States of America) and observers from the WHO and NEA/OECD. The meeting was opened by Mr T. Taniguchi, DDG-NS, followed by introductory remarks by Mr A. Wrixon, NSRW.

2. In meeting to review the Code, the Group was particularly mindful of the desirability of strengthening the Code to address concerns that had arisen in the wake of the events of 11 September 2001 regarding the possible deliberate and malicious use of radioactive sources to cause damage to individuals, society and the environment. The Group therefore made a number of changes addressing security issues, including the addition of a specific objective relating to security and a reference to the need to protect facilities in which sources are managed as well as the sources themselves.

3. In addition, the Group also considered a range of issues, arising from, *inter alia*, a questionnaire circulated to Member States by the Secretariat in May 2002. The Group confirmed that the Code should cover only sealed radioactive sources, and made a number of minor consequential amendments to the Code. The Code was also amended to provide for the establishment of national registers of those radioactive sources which pose the most significant risks, i.e. the radioactive sources belonging to Category 1 of the IAEA's "Categorization of Radiation Sources". However, States should also devote appropriate attention to radioactive sources other than those belonging to Category 1. The Group did not feel that an international register of such sources was appropriate or necessary.

4. The Group agreed that exports of sources that may pose a significant risk to individuals, society or the environment should be subject to authorization. Such exports should, other than in exceptional circumstances, only take place where the exporting State is satisfied that the recipient is authorized to receive the source.

5. The Group reached consensus on the importance of life cycle management of sealed radioactive sources that pose a significant risk. Programmes for life cycle management include appropriate controls over manufacturing, distribution, use and disposal. Paragraph 17(b) of the Code emphasises the importance of this issue. Paragraph 21 of

the Code also addresses the issue, in relation to the possibility of return of sources to manufacturers where those sources have previously been exported.

6. The Group made some minor amendments to the Code where it felt that such amendments would assist in clarifying the intent of the Code. They are also reflected in the attached text.

7. The Group considered the actions relating to the safety and security of radioactive sources being undertaken by the Agency pursuant to its Revised Action Plan for the Safety and Security of Radiation Sources and its Nuclear Security Plan of Action. It noted in particular the need to complete the current process of revising the categorization of sources published in IAEA-TECDOC-1191 as a matter of priority, in order that international and national resources and actions can be prioritized as a result of a risk-based assessment.

8. The Group also noted the importance of the completion of the current work on a repository of information on the characteristics of sources and of devices containing sources, including transport containers, to aid in the identification of found orphan sources, and of a system for reporting on missing and found orphan sources. The Group suggested that the Agency develop common criteria for national registers of sources (see para. 3 above) to facilitate information exchange between regulatory bodies. The Group encouraged the Agency to continue providing assistance upon request to regulatory programmes as part of the Revised Action Plan, in order to promote the consistent application of the Code. The Group looked forward to the completion of a Safety Report on the Security of Radioactive Sources, which will assist in the consistent implementation of the Code.

9. The Group considered that a number of issues still required further consideration. Those issues included, among others, ways of encouraging broad adherence to the Code (see para. 12 below), and the security of facilities manufacturing or using radioactive sources. During the meeting, the issue of whether the Code should cover post-incident scenarios, through the insertion of more detailed provisions related to emergency response and the mitigation of consequences, was raised. The experts agreed that this was an important issue, which would need further consideration in capitals before any decision was taken on the inclusion of provisions in the Code. Another issue requiring further consideration was that of the recycling or reuse of sources. Some experts suggested that there be further discussions among both regulators and manufacturers on the reuse, recycling and standardization of sources.

10. The Group discussed whether a provision requiring users of radioactive sources to carry appropriate insurance to cover the costs of compensation in the event of an accident involving a source should be included in the Code. However, the Group felt that, in the light of uncertainties as to whether such insurance would be available, or available at an affordable price, no provision relating to insurance should be inserted in the Code at present. Some experts suggested that the Agency study this issue further, concentrating in the first instance on an assessment of the likely financial implications arising from the harmful effects of an accident involving a radioactive source, whether under management or orphaned. Some experts noted that the ultimate resolution of this issue

may have to await the finalization of the current revision of the Agency's Categorization of Radiation Sources.

11. The Group agreed on the need for export controls, but concluded that further details may need to be discussed. Matters such as verifying the validity of authorizations, and the translations of authorizations, should be reviewed. Further discussion on the desirability of encouraging manufacturers to take sources back was also needed.

12. In discussing ways in which broad adherence to the Code could be encouraged, some experts were of the view that the status of the Code should be enhanced so as to enable States to make commitments relating to the implementation of the principles it contained. Other experts felt that the current status of the Code, as a recommendation to Member States, was sufficient. The Group agreed that this issue deserved further consideration. However, the Group considered that, before any decision could be taken by the policy-making organs of the Agency as to whether, and how, the Code might be made the subject of individual commitments by States, the precise scope of the Code must be clarified. Such clarification could not be made until the current revision of the Agency's Categorization of Radiation Sources was finalized, and might also need to await the completion of the Safety Report referred to in paragraph 8.

13. Finally, the Group noted the importance of the amendments to the Code which had been agreed during its work. The attached revised Code should be provided to Member States attending the forthcoming meetings of the Board of Governors and General Conference for their information in draft form, together with the Chairman's report. The Group recommended that, once the current revision of the Agency's Categorization of Radiation Sources is finalized, the Director General consider convening a group of technical and legal experts to consider the revision of the scope of the Code, the resolution of the outstanding issues identified in paragraph 9 above and whether, and how, the principles set out in the Code might be made the subject of individual commitments by States.

Steven McIntosh

Chairman

23 August 2002

GOV/2002/35/Add.1-GC(46)/11/Add.1
Annex
Attachment

Draft revised Code of Conduct on the Safety and Security of Radioactive Sources

International Atomic Energy Agency

The IAEA's Member States

Noting that radioactive sources are used throughout the world for a wide variety of beneficial purposes, e.g. in industry, medicine, research, agriculture and education,

Aware that their use involves risks due to radiation exposure,

Recognizing the need to protect individuals, society and the environment from the harmful effects of possible malicious acts involving radioactive sources,

Noting that serious accidents and malicious acts in connection with radioactive sources have occurred as a result of ineffective, or lapses in the continuity of, regulatory control or as a result of lapses in management control, leading to the existence of orphan sources,

Aware that the risks arising from such incidents must be minimised and protected against through the application of appropriate radiation safety and security standards,

Recognizing the importance of fostering a safety and security culture in all organizations and among all individuals engaged in the regulatory control or in the management of radioactive sources,

Recognizing the need for effective and continuous regulatory control, both within States and in situations involving the transfer of radioactive sources between States,

Recognizing the need for technical facilities, including appropriate equipment and qualified staff, to ensure the safe management and secure protection of radioactive sources,

Recognizing that a number of States may lack appropriate infrastructure for the safe management and secure protection of radioactive sources, and that consequently exporting States should take due care in authorizing exports,

Noting that the International Basic Safety Standards for Protection against Ionizing Radiation and for the Safety of Radiation Sources contain recommendations for protection against exposure to ionizing radiation and for the safety and security of radioactive sources,

Recalling the IAEA's Safety Requirements document on Legal and Governmental Infrastructure for Nuclear, Radiation, Radioactive Waste and Transport Safety,

Taking account of the provisions of the Convention on Early Notification of a Nuclear Accident (1986) and of the provisions of the Convention on Assistance in the Case of Nuclear Accident or Radiological Emergency (1986),

Taking account of the provisions of the Joint Convention on the Safety of Spent Fuel Management and on the Safety of Radioactive Waste Management (1997), in particular those provisions which relate to the transboundary movement of radioactive waste and to the possession, remanufacturing or disposal of disused sealed sources,

Recognizing the global role of the IAEA in the area of the safety and security of radioactive sources,

Taking account of IAEA-TECDOC-1191, entitled "Categorization of Radiation Sources", and

Taking account of the approval by the Board of Governors of the activities regarding protection against nuclear terrorism proposed to it in March 2002, including activities relating to the security of radioactive material other than nuclear material,

DECIDE that the following Code of Conduct should serve as guidance to States for - *inter alia* - the development and harmonization of policies, laws and regulations on the safety and security of radioactive sources.

I. DEFINITIONS

1. For the purposes of this Code:

"authorization" means a permission granted in a document by a regulatory body to a legal person who has submitted an application to manufacture, supply, receive, store, use, transfer, import, export, transport, maintain or dispose of radioactive sources. The authorization can take the form of a registration or a licence.

"disused source" means a source no longer intended to be used.

"management" means all activities, administrative and operational, that are involved in the manufacture, supply, receipt, storage, use, transfer, import, export, transport, maintenance or disposal of radioactive sources.

"orphan source" means a source which poses sufficient radiological hazard to warrant regulatory control but is not under regulatory control, either because it has never been under regulatory control, or because it has been abandoned, lost, misplaced, stolen or transferred without proper authorization.

"radioactive source" means radioactive material that is permanently sealed in a capsule or closely bonded and in a solid form, excluding material within the nuclear fuel cycles of research and power reactors. It also includes any radioactive material released if the source is leaking or broken.

"regulatory body" means any body or bodies on which a State has conferred legal authority to regulate any aspect of the safety and security of radioactive sources, including legal authority to grant authorizations.

"regulatory control" means any form of control applied to facilities or activities by a regulatory body for reasons related to radiation protection or to the safety and security of radioactive sources.

"safety" means measures intended to minimize the likelihood of accidents with radiation sources and, should such an accident occur, to mitigate its consequences.

"safety culture" means the assembly of characteristics and attitudes in organizations and individuals which establishes that, as an overriding priority, protection and safety issues receive the attention warranted by their significance

"security" means measures to prevent unauthorized access to, and loss, theft and unauthorized transfer of, radioactive sources, and measures to protect facilities in which radioactive sources are managed.

"security culture" means characteristics and attitudes in organizations and of individuals which establish that security issues receive the attention warranted by their significance.

II. SCOPE AND OBJECTIVE

2. This Code applies to all radioactive sources that may pose a significant risk to individuals, society and the environment. In implementing this Code, States should give highest priority to those radioactive sources which pose the most significant risks, i.e. the radioactive sources belonging to Category 1 of the IAEA's "Categorization of Radiation Sources". However, in doing so, States should also devote appropriate attention to the regulation of radioactive sources other than those belonging to Category 1.

3. This Code does not apply to the control of nuclear materials as defined in the Convention on the Physical Protection of Nuclear Materials.

4. This Code does not apply to radioactive sources within military or defence programmes. However, such sources should be managed in accordance with the principles of this Code.

5. The objectives of this Code are:

   (a) to achieve and maintain a high level of safety and security of radioactive sources; and
   (b) to prevent unauthorized access to, and loss, theft and unauthorized transfer of, radioactive sources, and to protect facilities in which radioactive sources are managed, and through that to prevent the malicious use of radioactive sources to cause harm to individuals, society or the environment;

   through the development, harmonization and enforcement of national policies, laws and regulations, and through the fostering of international co-operation.
   These objectives will be achieved through the establishment of an adequate system of regulatory control from the production of radioactive sources to their final disposal, and a system for the restoration of such control if it has been lost.

6. This Code relies on existing international standards relating to legal and governmental infrastructure for nuclear, radiation, waste and transport safety and to the control of radioactive sources. It is intended to complement existing international standards in these areas.

III BASIC PRINCIPLES

GENERAL

7. Every State should, in order to protect individuals, society and the environment, take the appropriate measures necessary to ensure:
   (a) that the radioactive sources within its territory, or under its jurisdiction or control are safely managed and securely protected during their useful lives and at the end of their useful lives; and
   (b) the promotion of safety culture and of security culture.

8. Every State should establish an effective national legislative and regulatory system of control over the safe management and secure protection of radioactive sources, and over any other activity involving radioactive sources which entails a significant risk to individuals, society or the environment. Such a system should:
   (a) place the prime responsibility for the safe management of, and the security of, radioactive sources on the persons being granted the relevant authorizations;
   (b) minimize the likelihood of a loss of control;
   (c) include national strategies for gaining or regaining control over orphan sources
   (d) provide for rapid response for the purpose of regaining control over sources that are no longer under control;
   (e) foster ongoing communication between the regulatory body and users; and
   (f) provide for its continual improvement.

9. Every State should ensure that appropriate facilities and services for radiation protection and safety are available to, and used by, the persons who are authorized to manage radioactive sources or undertake any other activity with radioactive sources within its territory. Such facilities and services should include, but are not limited to, those needed for:
   (a) searching for missing sources and securing found sources;
   (b) intervention in the event of an accident involving a radioactive source;
   (c) personal dosimetry and environmental monitoring; and
   (d) the calibration and intercomparison of radiation monitoring equipment.

10. Every State should ensure that adequate arrangements are in place for the appropriate training of the staff of its regulatory body, its law enforcement agencies and its emergency services organisations.

11. Every State should promote awareness of the hazards associated with orphan sources, and should encourage bodies or persons likely to encounter orphan sources during the course of their operations to implement appropriate monitoring programmes to detect such sources.

12. Every State should, in implementing this Code, emphasize and reinforce to designers, manufacturers (both manufacturers of radioactive sources and manufacturers of devices in which radioactive sources are incorporated), suppliers, users and those managing disused sources their responsibilities for the safety and security of radioactive sources.

LEGISLATION AND REGULATIONS

13. Every State should establish legislation and regulations that:
    (a) prescribe and assign governmental responsibilities for the safety and security of radioactive sources;
    (b) provide for the effective control of radioactive sources;
    (c) specify the requirements for protection against exposure to ionizing radiation;
    (d) specify the requirements for the safety and security of radioactive sources; and
    (e) provide for the establishment of a national register of those radioactive sources which pose the most significant risks, i.e. the radioactive sources belonging to Category 1 of the IAEA's "Categorization of Radiation Sources". However, in doing so, States should also devote appropriate attention to radioactive sources other than those belonging to Category 1.

14. Such legislation and regulations should include, in particular:
    (a) the establishment of a regulatory body whose regulatory functions are effectively independent of other functions if that body is involved in both the management of radioactive sources and in their regulation. This body should have the powers listed in paragraphs 15 to 17;
    (b) measures, commensurate with the risks, to protect individuals, society and the environment from the deleterious effects of radiation;
    (c) administrative requirements relating to the authorization of the management of radioactive sources;
    (d) provisions for exemption, as appropriate, from the administrative requirements referred to in paragraph (c) above;
    (e) administrative requirements relating to the notification to the regulatory body, as appropriate, by an authorized person of actions involved in the management of such sources and of any other activity in relation to such sources which may engender a significant risk to individuals, society or the environment;
    (f) managerial requirements in particular relating to the establishment of adequate policies, procedures and measures for the control of radioactive sources;
    (g) security measures to prevent, protect against, and ensure the timely detection of, the unauthorised access to, or the theft, loss or unauthorized use or removal of radioactive sources during all stages of management;
    (h) requirements relating to the verification of the safety and security of radioactive sources, through: safety and security assessments; monitoring and verification of compliance; and the maintenance of appropriate records;
    (i) the imposition of appropriate penalties;

REGULATORY BODY

15. Every State should ensure that the regulatory body established by its legislation has the authority to:
    (a) establish regulations and issue guidance relating to the safety and security of radioactive sources;
    (b) require those who intend to use radioactive sources to seek an authorization , and to submit a safety assessment when one is deemed necessary in the light of the risks posed;
    (c) require those who intend to manage radioactive sources to seek an authorization, and to submit an assessment of the security of the source and/or the facility in which it is to be managed, when one is deemed necessary in the light of the risks posed;
    (d) obtain all relevant information from an applicant for an authorization;
    (e) issue, amend, suspend or revoke, as necessary, authorizations for:
        (i) the management of radioactive sources; and
        (ii) any other activity involving such sources which may involve a risk to individuals, society or the environment;
    (f) attach clear and unambiguous conditions to the authorizations issued by it, including conditions relating to:
        (i) responsibilities;
        (ii) minimum operator competencies;
        (iii) minimum performance criteria and maintenance requirements for radioactive sources and devices in which they are incorporated;
        (iv) minimum performance criteria and maintenance requirements for equipment used to monitor the safety and security of radioactive sources;
        (v) requirements for emergency procedures and communication links;
        (vi) work procedures to be followed;
        (vii) the safe and secure management of disused sources, including, where applicable, agreements regarding the return of disused sources to a supplier;
        (viii) measures to determine, as appropriate, the trustworthiness of individuals involved in the management of radioactive sources; and
        (ix) the confidentiality of information relating to the security of sources;
    (g) obtain any relevant and necessary information from the holder of an authorization;
    (h) enter premises of authorized users to undertake inspections, according to established procedures, to verify compliance with regulatory requirements;
    (i) enforce regulatory requirements;
    (j) monitor, or request other authorized bodies to monitor, at appropriate checkpoints for the purpose of detecting orphan sources;
    (k) ensure that corrective actions are taken when a radioactive source is in an unsafe condition;
    (l) provide, on a case-by-case basis, to the holder of an authorization and the public any information that is deemed necessary in order to protect individuals, society and the environment;
    (m) liaise and co-ordinate with other governmental bodies and relevant non-governmental bodies within the State, and also with international bodies and with regulatory bodies in other States, in order to seek guidance, information and assistance relevant to the safe and secure management of radioactive sources;

(n) establish criteria for intervention in emergency situations;
(o) ensure that radioactive sources are stored in facilities appropriate for the purpose of such storage; and
(p) ensure that, where disused sources are fit for that purpose.

16. Every State should ensure that its regulatory body:
(a) is staffed by qualified personnel; and
(b) has the financial resources and the facilities and equipment necessary to undertake its functions in an effective manner.

17. Every State should ensure that its regulatory body:
(a) establishes procedures for dealing with applications for authorization;
(b) ensures that, before the receipt of a radioactive source is authorized:
(i) arrangements have been made for its safe management and secure protection once it has become a disused source; and
(ii) financial provision has been made for its safe management and secure protection once it has become a disused source.
(c) maintains appropriate records of holders of authorizations in respect of radioactive sources, with a clear indication of the type(s) of the radioactive sources that they are authorized to use, and appropriate records of the transfer and disposal of the radioactive sources on termination of the authorization;
(d) promotes the establishment of a safety culture and of a security culture among all individuals and in all bodies involved in the management of radioactive sources;
(e) establishes systems for ensuring that, where practicable, both radioactive sources belonging to Categories 1 and 2 of the IAEA's "Categorization of Radiation Sources", and their containment, are marked with an appropriate sign to warn members of the public of the radiation hazard, but where this is not practicable, at least the containment is so marked.
(f) establishes systems for ensuring that, where practicable, radioactive sources are identifiable and traceable, or where this is not practicable, ensures that alternative processes for identifying and tracing those sources are in place;
(g) ensures that inventory controls are conducted on a regular basis by the holders of authorizations;
(h) carries out both announced and unannounced inspections at a frequency determined by past performance and the risks presented by the radioactive source;
(i) takes enforcement actions, as appropriate, to ensure compliance with regulatory requirements;
(j) ensures that the regulatory principles and criteria remain adequate and valid and take into account, as applicable, operating experience and internationally endorsed standards and recommendations;
(k) requires the prompt reporting by authorized persons of loss of control over, and of incidents in connection with, radioactive sources;
(l) prescribes appropriate levels of training for manufacturers, suppliers and users of radioactive sources;
(m) requires authorized persons to prepare appropriate emergency plans;
(n) is prepared, or has established provisions, to recover orphan sources and to deal with radiological emergencies and has established appropriate response plans and measures;

(o) is prepared, in respect of any radioactive source whose export it has authorized, to provide, upon request, technical information relating to its safe management.

IMPORT AND EXPORT OF RADIOACTIVE SOURCES

18. Every State intending to import a radioactive source belonging to Categories 1 and 2 of the IAEA's "Categorization of Radiation Sources" should, other than in exceptional circumstances, consent to its import only if the State has the technical and administrative capability and the resources needed to manage the source in a manner consistent with the provisions of this Code.

19. Every State intending to export a radioactive source belonging to Categories 1 or 2 of the IAEA's "Categorization of Radiation Sources" should require the authorization of its export.

20. Every State intending to authorize the export of a radioactive source belonging to Categories 1 and 2 of the IAEA's "Categorization of Radiation Sources" should, other than in exceptional circumstances, consent to its export only if it is satisfied that the recipient is authorized to receive the source.

21. Every State should allow for re-entry into its territory of disused radioactive sources if, in the framework of its national law, it has accepted that they be returned to a manufacturer qualified to receive and possess the disused radioactive sources.

22. Every State which authorizes the export of a radioactive source should take appropriate steps to ensure that such export is undertaken in a manner consistent with existing international standards relating to the safe transport of radioactive materials.

ROLE OF THE IAEA

23. The IAEA should:
    (a) continue to collect and disseminate information on laws, regulations and technical standards relating to the safe and secure management of radioactive sources, develop and establish relevant technical standards and provide for the application of these standards at the request of any State, inter alia by advising and assisting on all aspects of the safe and secure management of radioactive sources; and
    (b) in particular, implement the measures approved by its policy-making organs.

DISSEMINATION OF THE CODE

24. Every State should inform public and private organizations and persons involved in the management of radioactive sources, as appropriate, of the measures it has taken to implement this Code and should take steps to disseminate that information widely.