



UNIFORMED SERVICES UNIVERSITY OF THE HEALTH SCIENCES



SUBJECT: USUHS Radiation Safety Program and Compliance with Radiation Safety Guide

Instruction 6402

FEB 21 2012

(EHS)

ABSTRACT

This Instruction outlines the administrative responsibilities and requirements of the Uniformed Services University of the Health Sciences (USUHS) Radiation Safety Program, as well as the organizational structure that supports its implementation.

A. Reissuance and Purpose.

This Instruction reissues USUHS Instruction 6402^a to:

1. Assign responsibilities for the Radiation Safety Program at USUHS.
2. Incorporate substantive administrative changes.

B. References. *See Enclosure 1.*

C. Background.

USUHS is authorized to use radioactive material under Nuclear Regulatory Commission (NRC) Byproduct Materials License #19-23344-01^b. The license requires that organizational personnel adhere to NRC rules and regulations governing procedures for the acquisition, control, and disposal of all radioactive materials. To ensure full compliance with these rules, it is mandatory that all USUHS personnel follow the written procedures of USUHS Instruction 6402-M^c.

D. Applicability.

This Instruction applies to all persons working at, visiting, or otherwise having access to radioactive material research facilities at USUHS.

E. Policy.

1. USUHS is committed to the concept of keeping all radiation doses to individuals and releases of radioactive material to the environment *As Low As Reasonably Achievable* (ALARA). Procedures outlined in this Instruction and in USUHS Instruction 6402-M have been established as a means of controlling the use of radioisotopes at USUHS. They are designed to protect the University community from unnecessary exposure to ionizing radiation, and to comply with NRC rules and regulations.

2. The Radiation Safety Officer (RSO) and the Radiation Safety Committee (RSC) are the executive managers of the Radiation Safety Program at this Institution. The RSC is a University committee composed of a group of professionals appointed by the University President and nominated to serve on the committee by the Deans of each of the academic schools. The RSC establishes the overall policy for the use of radioactive materials, and oversees all aspects of radiation safety at the USUHS. The term of each appointed committee member is for three years with reappointments determined by the University President. The Chair of the RSC is appointed by the President and must be a University faculty member with the education, training, experience, and knowledge to adequately address Radiation Safety Program issues. The Chair of the RSC must be available to facilitate effective and immediate action on behalf of the University President and is delegated the authority to take whatever action is necessary to ensure that all radiation safety practices are in accordance with the regulations and conditions of the NRC license. To establish a quorum, the Chairperson, the RSO, a representative of senior management, and three of the Departmental representatives must be present. The Chairperson may also represent his or her respective Department and be counted as one of the three Departmental representatives present.

3. When an unsafe use or condition involving radioactive material is brought to the attention of the RSO, he/she shall have the authority to immediately stop usage of the radioactive material. Final disposition of the problem will be the responsibility of the RSC. Cooperation with, and support of the RSO and the Radiation Safety Division, Center for Environmental Health and Occupational Safety (EHS) is paramount in successfully implementing the ALARA concept and to ensure compliance with the conditions set forth in the University's NRC radioactive material license.

F. Responsibilities.

1. The Radiation Safety Committee shall:

- a. Meet at least quarterly to review USUHS radiation safety program.
- b. Review recommendations on ways to maintain individual and collective doses ALARA.
- c. Review and approve/disapprove on the basis of safety and with regard to training and experience, requests by investigators for permission to use radioactive material.
- d. Review the training and experience of the RSO and approve/disapprove his/her appointment.
- e. Review on the basis of safety, and approve/disapprove, with the advice of the RSO, any request for amendment or renewal of the NRC Byproduct Materials License^b.
- f. Review on the basis of safety, and approve with the advice of the RSO, the use of any research laboratory located at USUHS for use of radioactive materials. Laboratories no longer using radioactive materials may be released for general use only after a complete closeout survey has been performed on the laboratory.

g. Review on the basis of safety, and approve with the advice of the RSO, changes in procedures and policies in the Radiation Safety Program at the USUHS.

h. Review quarterly, with the assistance of the RSO, a summary of the occupational radiation dose records of all personnel enrolled in the radiation dosimetry monitoring program.

i. Review quarterly, with the assistance of the RSO, all incidents involving radioactive material with respect to the cause and subsequent actions taken.

j. Review annually, with the assistance of the RSO, the radiation safety program at the USUHS.

k. Review for final action/disposition any program or procedure involving the use of radioactive material or a radiation producing device that has been suspended by the RSO.

2. The Radiation Safety Officer shall:

a. Serve as the executive manager for the Radiation Safety Program and the Executive Secretary for the RSC at the USUHS.

b. Implement the Radiation Safety Program in accordance with Directives and Regulations from DoD, and the NRC, and the policies formulated by members of the USUHS RSC.

c. Receive assistance from the professional and technical staff of EHS.

d. Ensure compliance with the responsibilities outlined in 10 CFR, Part 35.21^d.

e. Exercise staff supervision over the Radiation Safety Program.

f. Provide consultation and advice on the degree of hazards associated with radiation and the effectiveness of control measures.

g. Advise and assist all radiation workers in all matters pertaining to radiation safety, including the instruction and training of workers and others in the safe use of radioactive materials and radiation sources.

h. Ensure that all radioactive materials are properly receipted, used, stored, handled, shipped, and disposed of according to applicable directives; and, on a quarterly basis, provide the RSC with summary reports in these areas as well as on personnel radiation doses, and ALARA investigations.

i. Formulate and implement the Radiation Safety Program.

j. Formulate, implement, and supervise an active and documented program designed to keep radiation doses and releases to the environment at ALARA.

- k. Assist the RSC in formulating policy for the Radiation Safety Program at the USUHS.
- l. Review all applications for use of radioactive materials to ensure completeness and recommend approval/disapproval to the RSC.
- m. Provide an annual review of the Radiation Safety Program to the RSC.
- n. Review and approve procurement of all radioactive materials to ensure compliance with NRC license conditions.
- o. Evaluate hazard potential and adequacy of protective measures for existing and proposed operations.
- p. Investigate radiation accidents and incidents and overexposure to determine the cause and take steps to prevent recurrence.
- q. Suspend a program or procedure involving the use of radioactive material or radiation producing devices that are determined to deviate from prescribed procedures and directives.
- r. Maintain the NRC Byproduct Material License^b, supporting documentation, and requests for amendments and renewals.

3. The Center for Environmental Health and Occupational Safety shall:

- a. Provide professional and technical support for users of radioactive material as specified in USUHS Instruction 6402-M^c.
- b. Maintain copies of the NRC Byproduct Materials License #19-23344-01^b, USUHS Instruction 6402-M^c, and 10 CFR, Part 19^e for public review in Rooms A2020 and G040.

4. Department Chairs or Activity Heads shall ensure that all use of radioactive material within their department(s) or activity(s) has been approved by the RSC or the RSO.

5. The Director of the Armed Forces Radiobiology Research Institute shall maintain their own radiation safety program and instruction that compliments and integrates with this University Instruction.

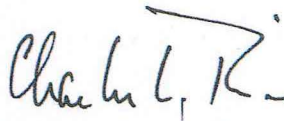
6. Users of Radioactive Material shall:

- a. Maintain a copy of USUHS Instruction 6402-M^c in their laboratory.
- b. Be familiar and comply with procedures and conditions in USUHS Instruction 6402-M^c and NRC Byproduct Materials License #19-23344-01^b.

c. Be familiar and comply with:

- (1) The ALARA concept.
- (2) The control and safe use of radioactive materials.
- (3) DoD and NRC directives and regulations.
- (4) The procedures and policies of USUHS.

d. Understand their responsibility to report actions or procedures that they feel are unsafe or do not comply with USUHS Radiation Safety Program to supervisory personnel and the RSO.

A handwritten signature in black ink, appearing to read "Charles L. Rice".

Charles L. Rice, M.D.
President

Enclosure:

1. References

REFERENCES

- (a) USUHS Instruction 6402, "Compliance with USUHS Radiation Safety Guide," dated September 3, 1999 (hereby cancelled).
- (b) USUHS Nuclear Regulatory Commission License of Broad Scope #19-23344-01.
- (c) USUHS Instruction 6402-M, "Radiation Safety Guide," dated October 6, 2009.
- (d) Title 10, Code of Federal Regulation, Part 35.21, "Medical Use of Byproduct Material."
- (e) Title 10, Code of Federal Regulations, Part 19, "Notices, Instructions and Reports to Workers: Inspections and Investigations."