

ENFORCEMENT ACTIONS

PURPOSE

The following procedure contains the steps that are to be taken if it becomes necessary to notify a Responsible User of serious deficiencies in complying with radiation safety procedures and, if necessary, to restrict the acquisition of radionuclides or the use of radiation sources until the deficiencies are corrected.

POLICY

The Radiation Safety Officer (RSO) is authorized and directed by the Radiation Safety Committee to take such actions as are necessary to enforce the regulations, license conditions, and University policies and procedures that govern the use of radioactive materials or radiation sources by University personnel, including suspending operations where health & safety may be compromised. Actions to restrict the acquisition of radioisotopes or the use of any radiation source, for the purpose of enforcing compliance with radiation protection regulations or procedures shall be initiated only by the RSO. The affected user may appeal the action to the Radiation Safety Committee or to the Vice President for Research.

RESPONSIBILITIES

The RSO shall maintain an ENFORCEMENT ACTION FILE, which shall contain the records related to compliance enforcement actions. The RSO may release the restriction on acquisition of radionuclides or use of a radiation source after verifying that all of the deficiencies that initiated the restriction have been corrected.

CONDITIONS FOR ACTION

Any significant violations of radiation safety policies or procedures may be grounds for enforcement actions. Some of the most common deficiencies or violations are:

- 1 Repeated failure to return dosimetry devices.
- 2 Repeated failure to perform required bioassays or to submit bioassay results or samples.

- 3 Repeated failure to perform required laboratory surveys.
- 4 Repeated failure to return the RADIOISOTOPE RECEIPT AND VERIFICATION form (RPR 13B).
- 5 Repeated failure to return or to provide adequate information on the RADIOISOTOPE DISPOSITION RECORD (RPR 13C).

Before taking the enforcement actions described below, it is important that a conscientious effort be made to obtain compliance through personal discussions with the Responsible User or appropriate individuals in the User's group.

ENFORCEMENT PROCEDURE

- 1 Send the User a COMPLIANCE MEMO (sample attached). This memo should be addressed and printed individually from the word processor, listing only the specific items of noncompliance applicable to the User.
- 2 Give a copy of the COMPLIANCE MEMO to the Administrative Assistant to include in the agenda for the next meeting of the Radiation Safety Committee.
- 3 Change the entry in the "Status" field of the User's authorization file in the RADIATION SAFETY DATABASE to remove the authorization as an approved radioisotope purchaser.
- 4 Place a copy of the COMPLIANCE MEMO in the RESPONSIBLE USER'S FILE FOLDER and make an entry on the FILE INDEX SHEET indicating that the date the memo was sent.
- 5 Place a copy of the form or memo describing the nature of the noncompliance in the ENFORCEMENT ACTION FILE.
- 6 **Once a month**, the items in the ENFORCEMENT ACTION FILE shall be reviewed by the RSO.

- 7** The RSO will determine whether the authorization as a Responsible User shall be restricted, terminated, or submitted to the Radiation Safety Committee for action.

CLEARING OF NONCOMPLIANCE ACTIONS

- 1** If all noncompliance items have been resolved:
 - a** The appropriate entry shall be made in the "Status" field of the User's authorization record on the RADIATION SAFETY DATABASE.
 - b** The date the noncompliance was cleared is made on the RESPONSIBLE USER'S FILE INDEX SHEET.
 - c** The Administrative Assistant is informed of the date the noncompliance was cleared for reporting to the Radiation Safety Committee.
 - d** All forms and records related to this noncompliance action will be filed properly.



17 September 2003

TO:

FROM: Karen S. Langley, M.S., Radiation Safety Officer

SUBJECT: COMPLIANCE WITH RADIATION SAFETY PROCEDURES

This is a reminder that your authorization to use radioactive materials is conditional on your compliance with the regulations, policies and procedures of the Utah Bureau of Radiation Control and the University's Radiation Safety Committee. According to our records, you are presently not in compliance with requirements in the areas listed below. The Radiation Safety Committee has instructed me to take action to assure compliance.

The specific items of noncompliance that require immediate correction are:

Failure to perform and record contamination surveys on a regular basis, as required by RPR 11, RADIOISOTOPE LABORATORY SAFETY PROCEDURES.

Failure to perform required bioassays and submit the data to this office as required by RPR 12, BIOASSAYS FOR INTERNAL RADIOACTIVITY.

Failure to return the RADIOISOTOPE RECEIPT & VERIFICATION form (RPR 13B) promptly after a package of radioactive materials has been received. Our records show _____ reports not returned by you.

Failure to return the RADIOISOTOPE DISPOSITION RECORD (RPR 13C) and/or to complete it properly as required by RPR 13, RADIOISOTOPE ACQUISITION & DISPOSITION. (We can't tell from our records which of your outstanding inventory items have been used up, but the records indicate a rather large accumulation of old items.)

Failure to label radioactive wastes accurately and completely, as required by RPR 13, RADIOISOTOPE ACQUISITION & DISPOSITION.

Effective immediately, no further acquisitions of radioisotopes by you will be approved until compliance has been achieved. If this creates a hardship for your research, I am willing to discuss other means of obtaining the same objectives. Your prompt attention and action to resolve this problem will be greatly appreciated.

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