

UNIVERSITY OF TOLEDO

SUBJECT: Radiation Safety Committee

Procedure No: HM-08-51

PROCEDURE STATEMENT

The Radiation Safety Committee shall oversee all uses of radioactive material permitted by the license

PURPOSE OF PROCEDURE

To work with executive management and the RSO in implementing the radiation safety program to establish guidelines, promote consistency, and ensure safe use of radioactive material within the scope of the ODH regulations and University of Toledo policies and procedures to ensure the safety of staff, patients, and students.

PROCEDURE

1. The licensee shall select a chairperson for the committee. The chairperson shall be an individual with a knowledge of radiation safety issues, good leadership abilities, the authority and credibility by virtue of his or her position within the facility, and a desire to serve as chairperson will facilitate the effectiveness of the RSC. Additionally, the individual chosen as the chairperson must have the time to devote to the position in addition to other responsibilities he or she might have within the facility. Executive management should delegate a level of authority to the position so that the chairperson is effective. In general, the RSO should not be appointed as the chairperson of the committee, since the RSO is responsible for the day-to-day operation of the radiation safety program and may be too closely involved with the licensed activities to be objective.
2. The RSC shall meet as often as deemed necessary but not less than once each quarter and shall have a quorum present to conduct official business to identify and review substantive issues related to the use of radioactive material. A quorum consists of one-half of the members of the standing committee membership. Committee members participating by teleconference are considered "present" and their vote is counted. A simple majority vote (at a meeting that has a quorum) is required to approve or adopt a motion that has been proposed and seconded. The RSO and a representative of executive management must be present as part of the quorum. Special meetings, other than regular quarterly meetings, may be called by the chairperson, RSO, or any three committee members.
3. Committee members may designate an alternate if appropriate. Guests may attend RSC meetings only when their attendance is requested by the chairperson or the RSO to address pertinent RSC agenda items.
4. Minutes of the proceedings shall be recorded and circulated by the Radiation Safety Office to committee members and to personnel of the institution having a specific interest in the proceedings.
5. As per Ohio Administrative Code 3701:1-58-12, The committee must include an authorized user of each type of use permitted by the license, the radiation safety officer, a representative of the nursing service, and a representative of management who is neither an authorized user nor a radiation safety officer. The committee may include other members the licensee considers appropriate.

DUTIES AND RESPONSIBILITIES

1. Maintaining awareness of ODH regulations and license conditions pertaining to the radiation safety program.
2. Assisting the Radiation Safety Department with identifications of problems, their root causes, and their solutions.
3. Developing, adopting, and implementing policies and procedures specific to The University of Toledo for maintaining safety and compliance.
4. Reviewing, approving, refusing, or tabling all applications for the use of radioactive materials at The University of Toledo based upon the training and experience of the applicant in accordance with criteria established by ODH regulations. Prescribing specific conditions that may be necessary for the safe use of radioactive material in connection with granting approval of an application. The radioactive material possessed under the broad scope program may only be used by, or under the direct supervision of, individuals approved by the RSC.
5. Reviewing and recommending actions on applications for medical use of radioactive material in research with human subjects. Final approval by the RSC of these applications requires the final approval of the Institutional Review Board.
6. Reviewing the overall compliance status for authorized users, as needed.
7. Reviewing personnel dosimetry results, and discussing the results of required radiation surveys and any significant incidents, including spills, contamination, and medical events.
8. Maintaining a radiation safety program based upon sound radiation protection principles to achieve doses that are ALARA, and providing any necessary recommendations to ensure these principals are being met.
9. Reviewing any violation of the University of Toledo's Radiation Safety Program and taking appropriate action to address the violation. Violations will be reported to administration by the RSO and the administrative representative for the RSC.
10. Reviewing the results of the annual review of the radiation safety program, analyzing possible trends, and implementing timely corrective actions as needed.
11. Problems should be clearly defined and reviewed in the future as open items. An assessment of the effectiveness of corrective actions is also helpful in deterring or eliminating future problems and violations.
12. Recommending actions requiring financial support. Following appropriate discussions with the RSC, it is the responsibility of the University to meet that support. Otherwise, the RSC must balance the resources provided for safety and compliance with the use of radioactive materials.
13. The RSC, along with executive management and the RSO, will review and approve program and procedural changes in accordance with criteria developed and approved by the RSC. The criteria for reviewing and approving such changes should include provisions for training staff before implementing new procedures and ensuring that the proposed changes will not degrade the effectiveness of the currently approved program. Additionally, the audit program should include an evaluation process that will ensure that changes have been properly implemented by the staff and will determine the effectiveness of changes made in achieving program goals.

ENFORCEMENT

In the event of a failure to comply with ODH rules and regulations or University of Toledo specific policies governing the safe use of radioactive material, the RSO shall notify the offending individual(s). Notification will state the nature of any issue of non-compliance as well as the information that an unfavorable report will be made to the RSC unless the issue is remedied. If full compliance has not been achieved within a reasonable allotted period of time, the RSO shall bring the matter to the attention of the RSC at its next quarterly meeting. If the issue of non-compliance is serious in nature, the RSO shall report the issue to the RSC at the next quarterly meeting or may call a special committee meeting to address the matter. After consideration of the report, the RSC may make recommendations for mandatory remedial actions with a failure to comply being just cause for withdrawal of the RSC's approval of the individual's Authorized User status. In enforcement cases, the Authorized User may be present at the RSC hearing if he or she so desires.