

<b>No./Title:</b> RSP01 - Enforcement of the Radiation Safety Program	<b>Resp. Office:</b> Research Safety Affairs	<b>Effective Date:</b> 01/24/2018
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## PURPOSE

To outline the violation and enforcement policy and procedures of the UTHSC Radiation Safety Committee (RSC).

## GENERAL

This policy groups violations of radiation safety policies and procedures into severity level groups, each with its own levels of response. Repeated violations and/or a willful failure to comply with established policies, procedures, and regulations can result in suspension or revocation of authorizations granted by the Radiation Safety Committee. Violations are grouped by severity. Enforcement is based on severity and frequency of occurrence in a 1-year period. Enforcement actions are coordinated by the Radiation Safety Officer (RSO).

## IMPLEMENTATION

Below is a list of violations and their severity level.

SEVERITY	VIOLATION
<b>Level 1</b>	<ul style="list-style-type: none"> <li>• Willful noncompliance resulting in a severity level 2 violation.</li> <li>• Falsification of records.</li> </ul>
<b>Level 2</b>	<ul style="list-style-type: none"> <li>• Unsecured Radioactive Materials</li> <li>• Generation of Radioactive Mixed Wastes without Prior Approval of the RSO.</li> <li>• Radioactive Materials disposed of in non-radioactive trash / unlabeled radioactive waste.</li> <li>• Improper radioactive waste disposal which could adversely affect public health.</li> <li>• Transport of radioactive materials off campus without RSO approval.</li> <li>• Procurement of radioactive materials without prior RSO approval.</li> <li>• Failure to report personal contamination to the RSO.</li> <li>• Willful noncompliance resulting in a severity level 3 violation.</li> </ul>

SEVERITY	VIOLATION
<p style="text-align: center;"><b>Level 3</b></p>	<ul style="list-style-type: none"> <li>• Disposal of lead in the radioactive waste / improper disposal of lead.</li> <li>• Eating, drinking, smoking, or the use of cosmetics in a posted area.</li> <li>• Pipetting radioactive materials by mouth.</li> <li>• Failure to wear dosimetry when required by RSO.</li> <li>• Failure to wear <i>appropriate</i> Personal Protective Equipment (PPE) when working with radioactive material.</li> <li>• Wearing open toed shoes when working with radioactive material.</li> <li>• Failure to receive radiation safety training – untrained personnel working with radioactivity or radiation producing machines.</li> <li>• Use of radiation in an unregistered location.</li> <li>• Failure to record sink disposal of radioactivity.</li> <li>• Failure to maintain records of radioactive waste disposal</li> <li>• Failure to report a spill of radioactive material.</li> <li>• Improper transport of radioactive materials on campus.</li> <li>• Failure to maintain an isotope inventory.</li> <li>• Failure to perform radiation surveys when working with radioactive material.</li> <li>• Unlabeled radioactive material.</li> <li>• Failure to comply with bioassay requirements.</li> </ul>

### POLICY FOR SEVERITY LEVEL 1 VIOLATIONS

SEVERITY	OCCURRENCE	ACTIONS
<p style="text-align: center;"><b>LEVEL 1</b></p>	1 <sup>st</sup>	<ul style="list-style-type: none"> <li>• Violation letter sent to Authorized User.</li> <li>• Immediate suspension of permit.</li> <li>• Authorized User appears before Radiation Safety Committee to discuss corrective actions.</li> </ul>
	2 <sup>nd</sup> and subsequent	<ul style="list-style-type: none"> <li>• Violation letter sent to Authorized User.</li> <li>• Immediate Suspension of permit</li> <li>• Authorized User appears before Radiation Safety Committee to discuss permanent revocation of privileges.</li> </ul>

Response letters are to be sent within one week from the date of the violation letter and/or meeting. Failure to respond to a violation or to follow any part of this policy will result in immediate suspension of the permit. Allowances may be made in extenuating circumstances.

## POLICY FOR SEVERITY LEVEL 2 VIOLATIONS

SEVERITY	OCCURRENCE	ACTIONS
<b>LEVEL 2</b>	1 <sup>st</sup>	<ul style="list-style-type: none"> <li>• Violation letter sent to Authorized User.</li> <li>• RSO meets with laboratory personnel to discuss possible courses of resolution.</li> <li>• 3. Authorized User responds in writing to the RSO summarizing corrective actions. Results are reported to RSC.</li> </ul>
	2 <sup>nd</sup>	<ul style="list-style-type: none"> <li>• Violation letter sent to Authorized User.</li> <li>• Authorized User meets with RSO to implement corrective actions.</li> <li>• Authorized User responds to RSO in writing to document implementation of corrective actions. Results are reported to RSC.</li> </ul>
	3 <sup>rd</sup> and subsequent	<ul style="list-style-type: none"> <li>• Violation letter sent to Authorized User.</li> <li>• Immediate suspension of permit.</li> <li>• Authorized User appears before Radiation Safety Committee to discuss corrective actions.</li> </ul>

Response letters are to be sent within one week from the date of the violation letter and/or meeting. Failure to respond to a violation or to follow any part of this policy will result in immediate suspension of the permit. Allowances may be made in extenuating circumstances.

## POLICY FOR SEVERITY LEVEL 3 VIOLATIONS

SEVERITY	OCCURRENCE	ACTIONS
<b>LEVEL 3</b>	1 <sup>st</sup>	<ul style="list-style-type: none"> <li>• Violation letter sent to Authorized User.</li> <li>• Authorized User responds in writing to the RSO summarizing corrective actions. RSO reports results to RSC.</li> </ul>
	2 <sup>nd</sup>	<ul style="list-style-type: none"> <li>• Violation letter sent to Authorized User.</li> <li>• Authorized User meets with RSO to implement corrective actions.</li> <li>• Authorized User responds to RSO in writing to document implementation of corrective actions. Results are reported to RSC.</li> </ul>
	3 <sup>rd</sup>	<ul style="list-style-type: none"> <li>• Violation letter sent to Authorized User.</li> <li>• Authorized User appears before Radiation Safety Committee to discuss corrective actions.</li> </ul>
	4 <sup>th</sup> and subsequent	<ul style="list-style-type: none"> <li>• Violation letter sent to Authorized User.</li> <li>• Immediate suspension of permit.</li> <li>• Authorized User appears before Radiation Safety Committee to assure that corrective actions have been taken.</li> </ul>

Response letters are to be sent within one week from the date of the violation letter and/or meeting. Failure to respond to a violation or to follow any part of this policy will result in immediate suspension of the permit. Allowances may be made in extenuating circumstances.