

Title:	General Safety Compliance and Training Radiation Safety Program Enforcement Policies
Approved by:	Environmental health and Safety
Effective Date:	11/01/2000
Responsible Official:	Environmental Health and Safety
Responsible University Office:	Environmental Health and Safety
Revision History:	None
Related Legislation and University Policy:	ODH
Review Period:	5 years
Last Review Date:	7/29/2021
Relates to:	All of CWRU Community

Purpose

The RSOF works in the interest of the university by supporting research. The structure of the program is continually refined to minimize restrictions on research activities while ensuring compliance with the requirements of all regulatory agencies, particularly those of the ODH.

Compliance with radiation safety program requirements is generally very good, and we acknowledge the excellent cooperation of the research staff responsible for this success. Nonetheless, the perceived risk associated with radiation and radioactivity has provided the underpinnings for a regulatory environment that results in penalties and sanctions for any activities that suggest improper use of radiation and radioactive material (RAM). Consequently, certain actions perceived by an individual to be safe or harmless may in fact result in serious consequences for the university. In other words, even a single, unintentional oversight can have serious consequences.

This enforcement policy, while having little if any effect on the activities of the vast majority of researchers using radioactive material (RAM), allows us to effectively sanction those few who, albeit unintentionally, jeopardize safety or the continued favorable relationship between the university and the Ohio Department of Health. It is designed to encourage the participation and cooperation of users of RAM and to ensure safe use of such material in a manner consistent with the rules and regulations of the ODH as interpreted by the RSC and the RSOF.

Policy

The responsibility for safe use of radioactive material (RAM) is placed on the Authorized Users (AU) as well as on the RSOF and the RSC. A system of consequences for violations of regulations concerning safe use of RAM will be used for educating and

alerting the Authorized Users (AU), motivating individual users, and determining future user authorization.

A violation will generally be identified by a member of the RSOF during a routine compliance inspection, monthly security check, or laboratory survey. This does not preclude violations being identified at other times or being identified through self-reporting by an Authorized User (AU). We are re-instituting the policy of providing each Authorized User (AU) with a copy of the compliance review Sheet following each compliance inspection. This will be done whether any deficiencies are identified or not.

We have simply defined three classes of deficiencies: minor, moderate, and major. The specific acts that are included in a deficiency category are listed below. This policy became effective on November 1, 2000 and will not be retroactive.

Any notifications or other actions associated with this policy must be reviewed and approved by the RSO or assistant RSO prior to implementation.

Appeal Process

Authorized users (AU) have the opportunity to appeal a decision made either by the RSO or by the RSC. The appeal will be a formal written response from the AU to the RSO who will, in consultation with appropriate RSC members, consider the appeal.

The appeal must be received by the RSO within five (5) working days of receipt by the AU of the notice of violation. The appeal will be acted on and the AU notified of the results within five (5) working days of the receipt of the appeal by the RSO.

Enforcement

- Spills and accidents are not violations unless they are the result of failure to comply with regulations and/or conditions of an AU's approved protocol for use of RAM.
- Minor severity violations are the least serious and include but are not limited to the following:

Laboratory Records:

- RAM shipments not monitored or recorded.
- RAM sewer disposals not recorded or exceeding limits.
- Sewer disposal logs that do not indicate isotope, activity, date, or chemical.
- Minimum survey frequency not met.
- Surveys not done with proper instruments.
- Survey results not converted to activity units.
- RAM waste disposal records not in order.

RAM Use and Storage

- RAM labels that do not indicate isotope, activity, and date.
- RAM not appropriately shielded.
- Laboratory work surfaces for RAM use not covered or appropriately labeled
- RAM work areas not properly labeled.
- Survey meter not available or not functional.
- Dosimetry not worn when appropriate.
- Appropriate personal protective equipment (PPE) not used during RAM use.
- Laboratory Environment / General Safety
- RAM waste not labeled with isotope, activity, and date.
- RAM waste not properly segregated and shielded.
- Liquid waste not doubly contained.

Corrective Action for Minor Violations

When three violations have occurred within the calendar year:

- Written notice sent to the Authorized User (AU).
- Termination of isotope ordering privileges until the Authorized User (AU) satisfies the RSO that corrective measures have been taken.

Moderate severity violations include but are not limited to the following:

- Storage or use of food, drink or cosmetics, including hand lotion, in a RAM posted laboratory. (*FOOD OR COSMETICS IN LABORATORY*)
- Failure to properly secure RAM. (*RAM UNSECURED*)
- Use or storage of RAM in unauthorized areas. (*RAM IN UNAUTHORIZED AREAS*)
- Failure to notify the RSOF prior to laboratory move. (*UNAPPROVED MOVE*)
- Failure to inform RSOF prior to disposal of contaminated (or potentially contaminated) equipment. (*UNAPPROVED DISPOSAL*)
- Failure to identify contamination exceeding 2200 dpm/100 cm² in multiple locations in work areas (*UNIDENTIFIED CONTAMINATION*)
- Failure to respond to a written notice from the RSO within 30 days. (*FAILURE TO RESPOND TO WRITTEN NOTICE*)

- Two moderate severity violations in a calendar year will result in:
 - Written and verbal notification by the RSO to the Authorized User (AU), with written notice sent to the Authorized User's Department Chair.
 - Termination of isotope ordering privileges until the Authorized User (AU) satisfies the RSO that corrective measures have been taken.

Major severity violations include but are not limited to the following:

- Falsification of required radiation safety records. (*FALSIFICATION OF RECORDS*)
- Failure to immediately report loss or theft of radioactive material (RAM). (*LOSS OR THEFT UNREPORTED*)
- Unauthorized shipment or receipt of radioactive material (RAM). (*UNAPPROVED TRANSFER*)
- A major severity violation will result in:
 - Immediate verbal notification of the Authorized User (AU) by the RSO.
 - Written notification sent to the AU by the RSO with copies sent to the AU's department chair and to the RSC chairperson.
 - Suspension of RAM ordering privileges until the item is resolved to the satisfaction of the RSO and the RSC chairperson.
 - Possible suspension of authorization to use RAM, at the discretion of the RSO pending review by the RSC.
 - Possible termination of authorization to use RAM based on a majority vote of the RSC.