



DEPARTMENT OF THE NAVY
NAVY ENVIRONMENTAL HEALTH CENTER
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Ser OEM/ **001446**
06 JAN 2004

From: Commanding Officer, Navy Environmental Health Center

Subj: NAVAL RADIOACTIVE MATERIAL PERMIT (NRMP) INFORMATION NOTICE
2004-02: RESPONSIBILITIES OF THE RADIATION SAFETY OFFICER (RSO)

Ref: (a) Title 10, Code of Federal Regulations (CFR), Part 35; Medical Use of Byproduct Material.
(b) NUREG-1556; Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Medical Use Licenses; October 2002.
(c) NAVMED P-5055; Radiation Health Protection Manual; August 2001.

1. Each command permitted through the Naval Radioactive Material Permit (NRMP) Program to possess, use or store nuclear reactor byproduct material, shall establish the authority, duties, and responsibilities of a Radiation Safety Officer (RSO), as required in accordance with Section 35.24 in reference (a). The permittee's management shall appoint an RSO, who agrees, in writing, to be responsible for implementing the radiation protection program. A model "delegation of authority" letter is provided in Appendix I of reference (b), and may be used to delegate authority to the RSO. The permittee, through the RSO, shall ensure that radiation safety activities are being performed in accordance with permittee-approved procedures and regulatory requirements. This information notice is to provide further guidance on the responsibilities of the RSO.
2. An NRMP permittee shall provide the RSO sufficient authority, organizational freedom, time, resources, and management prerogative, to: (a) identify radiation safety problems; (b) initiate, recommend, or provide corrective actions; (c) stop unsafe operations; and, (d) verify implementation of corrective actions.
3. For up to 60 days each year, a permittee may grant permission to an authorized user (AU) or an individual qualified to be an RSO, under Sections 35.50 and 35.59 of reference (a), to function as a temporary RSO and to perform the functions of the RSO, if the permittee takes the actions required in paragraphs (b), (e), (g), and (h) of Section 35.24 of reference (a), and notifies the Navy Environmental Health Center (NAVENVIRHLTHCEN) within 30 days after permission has been granted. In addition, a permittee may simultaneously appoint more than one temporary RSO in accordance with paragraph (c) of Section 35.24 of reference (a), if needed to ensure that the permittee has a temporary RSO that satisfies the requirements to be an RSO for each of the different types of uses of byproduct material permitted by the NRMP.
4. In accordance with Appendix I of reference (b), the RSO's duties and responsibilities shall include ensuring radiological safety and compliance with the Nuclear Regulatory Commission (NRC) and Department of Transportation (DOT) regulations and the conditions of the NRMP.

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5. As a minimum, these duties and responsibilities of the RSO shall include ensuring the following:
- (a) Stopping unsafe activities involving permitted radioactive material;
 - (b) Radiation exposures are as low as reasonably achievable (ALARA);
 - (c) Up-to-date radiation protection procedures in the daily operation of the licensee's byproduct material program are developed, distributed, and implemented;
 - (d) Possession, use, and storage of permitted radioactive material is consistent with the limitations in the NRMP, the regulations, the sealed source and device registry (SSDR) certificate(s), and the manufacturer's recommendations and instructions;
 - (e) Individuals installing, relocating, maintaining, adjusting, or repairing devices containing sealed radioactive sources are trained and authorized by an NRC or Agreement State license or permit;
 - (f) Personnel training is conducted and is commensurate with the individual's duties regarding permitted material;
 - (g) Documentation is maintained to demonstrate that individuals are not likely to receive, in one year, a radiation dose in excess of 10 % of the allowable limits or that personnel monitoring devices are provided;
 - (h) When necessary, personnel monitoring devices are used and exchanged at the proper intervals, and records of the results of such monitoring are maintained;
 - (i) Permitted material is properly secured;
 - (j) Documentation is maintained to demonstrate, by measurement or calculation, that the total effective dose equivalent (TEDE) to the individual likely to receive the highest dose from the permitted operation does not exceed the annual limit for members of the public;
 - (k) Proper authorities are notified of incidents such as loss or theft of permitted material, damage to or malfunction of sealed sources, and fire;
 - (l) Medical events and precursor events are investigated and promptly reported to NAVENVIRHLTHCEN, and cause(s) and appropriate corrective action(s) are identified, and timely corrective action(s) are taken;
 - (m) The radiation health program is managed and documented in accordance with regulations and procedures specified in reference (c), Radiation Health Protection Manual, NAVMED P-5055;

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(n) Audits of the radiation protection program (NRMP program) are performed at least annually and documented;

(o) Evaluations of the radiation health program are performed semi-annually to ensure compliance with regulations and procedures specified in reference (c), Radiation Health Protection Manual, NAVMED P-5055;

(p) If violations of regulations, permit conditions, or program weaknesses are identified, effective corrective actions are developed, implemented, and documented;

(q) Permitted radioactive material is transported, or offered for transport, in accordance with all applicable DOT requirements;

(r) Appropriate records are maintained;

(s) An up-to-date NRMP is maintained and amendment and renewal requests are submitted to NAVENVIRHLTHCEN in a timely manner; and

(t) Command's instruction governing the permittee's radiation protection program is current, and any changes or revisions are forwarded to Navy Environmental Health Center (NAVENVIRHLTHCEN) within 30 days. This need not be sent as an amendment to the NRMP.

6. The responsibilities and requirements of the permittee's RSO shall be listed in the permittee's "command instruction" which governs the implementation of their radiation safety program. Alternatively, the command's instruction may reference this NRMP Information Notice.

7. For additional information, please contact the Radiation Health Team Leader, LCDR Pam Fetherston, MSC, USN at DSN 377-0766 or (757) 953-0766, Fax (757) 953-0685, fetherstonp@nehc.med.navy.mil or pomijeb@nehc.med.navy.mil.

P. T. Fetherston

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By direction

Distribution:
All Medical NRMP Radiation Safety Officers

Copy to:
OPNAV (N455)
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NSHS Portsmouth VA (Attn: Clinical Nuclear Medicine School)