



**DEPARTMENT OF THE NAVY**  
NAVY ENVIRONMENTAL HEALTH CENTER  
620 JOHN PAUL JONES CIRCLE SUITE 1100  
PORTSMOUTH VA 23708-2103

6470  
Scr OEM/ 001281

13 SEP 2005

From: Commanding Officer, Navy Environmental Health Center

Subj: NAVAL RADIOACTIVE MATERIALS PERMIT (NRMP) INFORMATION NOTICE  
2005-03: ROUTINE NOTIFICATIONS AND MINOR PROGRAM CHANGES NOT  
REQUIRING A PERMIT AMENDMENT

Ref: (a) OPNAVINST 6470.3 series  
(b) Title 10, Code of Federal Regulations (CFR), Part 35  
(c) NUREG 1556, Vol. 9, Rev. 1: Program-Specific Guidance about Medical Use  
Licenses  
(d) Naval Radiation Safety Committee (NRSC) Bulletin 2004-03: Notifications and  
Reports for Reportable Events

1. This Information Notice is issued to remind medical permittees of the Navy's routine reporting and notification procedures in accordance with the Naval Master Materials Licensing (MML) Program requirements as stipulated in reference (a). Specific requirements for reporting can also be found in references (b) and (c). This Information Notice only applies to "routine" notification procedures, and does not cover emergency notification procedures regarding adverse incidents and reportable events, which had previously been addressed in reference (d).

2. Notifications shall be in the form of a written report signed by management, which is to be forwarded to the Navy Environmental Health Center (NAVENVIRHLTHCEN) within 30 days of the following routine occurrences:

a. A permittee authorizes an individual to work as an authorized user (AU), authorized medical physicist (AMP), or authorized nuclear pharmacist (ANP) under the exceptions listed in 10 CFR 35.13(b), with required documentation provided to NAVENVIRHLTHCEN in lieu of the Nuclear Regulatory Commission (NRC), as specified in 10 CFR 35.14(a). [Note: This does not apply to situations in which an amendment is required per 10 CFR Part 35 regulations];

b. An AU, AMP, ANP, or a Radiation Safety Officer (RSO) permanently discontinues performance of duties under the permit or has a name change or a change in employment status;

c. The permittee's mailing address changes;

d. The permittee's name changes, but the name change does not constitute a transfer of control of the permit as described in 10 CFR 30.34(b); or

e. The permittee has added to or changed the areas of use identified in the application or on the permit where byproduct material is used in accordance with either 10 CFR 35.100 or 35.200. [Note: This only applies to National Naval Medical Center, Bethesda since they hold a broad scope permit. All other permittees require an amendment to change the areas of use.]

3. In addition to the above notifications, the permittee shall notify NAVENVIRHLTHCEN within 30 days of implementing radiation protection program changes that affect safety, but do

Subj: NAVAL RADIOACTIVE MATERIALS PERMIT (NRMP) INFORMATION NOTICE  
2005-03: ROUTINE NOTIFICATIONS AND MINOR PROGRAM CHANGES NOT  
REQUIRING A PERMIT AMENDMENT

not require a permit amendment per 10 CFR 35.13. Documentation shall be in the form of a written report, including approval by the Command's Radiation Safety Committee (RSC), a copy of the revised policies, procedures and or documents, and shall be signed by management. Per the requirements in 10 CFR 35.26, a permittee may revise its radiation protection program without prior approval only under the following conditions:

- a. The revision does not require a permit amendment under 10 CFR 35.13;
  - b. The revision is in compliance with the regulations and the permit;
  - c. The revision has been reviewed and approved by the RSO, RSC and permittee's management;
  - d. The affected individuals are instructed on the revised program before the changes are implemented; and
  - e. Program changes are documented and records maintained in accordance with 10 CFR 35.2026.
4. Note that there may be other situations in which you may be required to make notifications and/or reports. In addition, if it is unclear as to whether or not to make a notification, contact NAVENVIRHLTHCEN to discuss the issue and determine if a formal notification is required.
5. RSOs shall ensure that their RSC and applicable NRMP radiation workers (i.e., radiation safety personnel, AUs, nuclear medicine technicians, physicists, etc.) are briefed on the above notification requirements and other reporting and notification procedures as stipulated in their NRMP.
6. This letter shall be maintained on file with your NRMP and shall be considered as an integral part of your NRMP. This and other Bulletins and Information Notices can be found at <http://www-nehc.med.navy.mil/occmcd/nrmp.htm>.
7. For additional information, please contact LCDR Brian D. Pomije, Radiation Health Team Leader at DSN 377-0766 or (757) 953-0766, facsimile (757) 953-0685 or by e-mail at [pomijeb@nehc.med.navy.mil](mailto:pomijeb@nehc.med.navy.mil).



B. D. POMIJE  
By direction

Distribution:

All Medical NRMP Permittees  
NSHS, Portsmouth, VA (Attn: Clinical Nuclear Medicine School)

Copy to:

OPNAV (N455)  
BUMED (M342)