



DEPARTMENT OF THE NAVY
BUREAU OF MEDICINE AND SURGERY
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FALLS CHURCH, VA 22042

IN REPLY REFER TO
BUMEDINST 6470.20A
BUMED-M3B3
21 Jul 2015

BUMED INSTRUCTION 6470.20A

From: Chief, Bureau of Medicine and Surgery

Subj: RADIOACTIVE MATERIAL PERMIT PROGRAM FOR MEDICAL USE

Ref: (a) OPNAVINST 6470.3A
(b) Atomic Energy Act, section 91B of 1954
(c) E.O. 12344
(d) 10 CFR 35
(e) NAVMED P-5055
(f) 10 CFR 20

1. Purpose. To prescribe procedures and responsibilities for use and control of Nuclear Regulatory Commission (NRC) licensed and other radioactive material used at naval medical department activities.
2. Cancellation. BUMEDINST 6470.20.
3. Scope. Applies to all naval medical department activities engaged in training, calibration, diagnostic or therapeutic procedures, research studies, or in-vitro studies using NRC regulated radioactive byproduct material, special nuclear material, source material, or naturally occurring or accelerator produced radioactive materials.
4. Background

a. In March 1987, the NRC granted Navy a License of Broad Scope for use and control of NRC-licensed radioactive material at Navy and Marine Corps commands where the NRC has regulatory jurisdiction. The License of Broad Scope authorized the Navy Radiation Safety Committee (NRSC), established by reference (a), to exercise control of NRC-licensed material used in the Navy and Marine Corps and to issue Navy radioactive material permits authorizing individual commands use of the material. The specific conditions for use of the material are in the terms of the permit.

b. The Navy and Marine Corps Public Health Center (NAVMCPUBHLTHCEN) was designated as the technical support center to coordinate the permit program for naval medical department activities. The Radiological Affairs Support Office of Naval Sea Systems Command (SEA 04N) was designated as the technical support center to coordinate the permit program for all other activities. Radioactive material transferred from the Department of Energy to the Department of Defense per reference (b) and radioactive material produced as a consequence of

the construction, operation, servicing, or maintenance of Naval Nuclear Propulsion Plants per reference (c), the Navy Nuclear Propulsion Program, were not included under the cognizance of the committee.

5. Responsibilities

a. NAVMCPUBHLTHCEN shall:

(1) Serve as technical support center to coordinate the permit program for naval medical department activities.

(2) Provide guidance and technical assistance to Navy and Marine Corps medical and dental activities in the preparation of Navy Radioactive Material Permit (NRMP) requests.

(3) Review permit requests for completeness and compliance with current regulations.

(4) Prepare and submit NRMPs to the Executive Secretary of the Navy Radiation Safety Committee for action.

(5) Perform inspections to assess compliance with current Navy and Federal regulations and provisions of specific permits.

(6) Report the results of the inspections to the Navy Radiation Safety Committee.

(7) Investigate NRMP incidents and make proper notification as required per reference (d).

(8) Review, analyze, and determine trends for radiological incidents associated with assigned NRMP.

(9) Establish procedures to control the procurement and acquisition of radioactive material by assigned permittees to ensure compliance with the Master Materials License.

(10) Provide technical assistance to permittees as appropriate, e.g., upon request of the commanding officer of the permit to manage an unusual situation where the technical need exceeds the expertise of local resources. Appropriate assist situations include instances such as recovery from a fire involving the spread of radioactive contamination, recovery from a major spill, or loss of control of radioactive material resulting in the closure of a clinic or ward, and subsequent release of the affected spaces or facilities for unrestricted use. Technical assist visits must be conducted in such a manner as not to constitute conflicts of interest with NAVMCPUBHLTHCEN's inspection responsibility.

(11) Ensure that Chief, Bureau of Medicine and Surgery (BUMED) is informed of all compliance issues related to the medical permits.

b. Navy Medicine (NAVMED) East and NAVMED West shall assist regional commanding officers and officers in charge in obtaining necessary resources to complete NRMP annual program review or audits.

c. Commanding officers and officers in charge shall:

(1) Ensure the command obtains a NRMP prior to receipt, possession or use of radioactive material.

(2) Provide management oversight of the NRMP and Radiation Protection/Safety Programs at the command, and ensure adequate resources and staffing are available to provide such oversight.

(3) Ensure compliance with the conditions of the NRMP and companion instructions concerning the safe receipt, possession, distribution, use, transportation, transfer, and disposal of radioactive material.

(4) Comply with Department of the Navy policy of maintaining personnel exposure as low as reasonably achievable.

(5) Maintain an effective radiation protection program as outlined in reference (e).

(6) Review radiological incidents within their commands and recommend corrective actions to the NRSC, via NAVMCPUBHLTHCEN.

(7) Conduct an annual program audit to ensure compliance with terms of the permit. For facilities inside of the continental United States, the audit must be conducted by persons independent of the command. For activities outside of the continental United States, the audit must be conducted by persons as independent of the permit as possible yet knowledgeable in the medical NRMP program requirements. Retain a copy of the audit report for 3 years. A copy of the audit shall be forwarded to NAVMCPUBHLTHCEN. In order to meet the annual permit review required in reference (f), the audit shall be reviewed by the command's Radiation Safety Committee with the assistance of the radiation safety officer.

(8) Make radiation health officers or radiation safety officers available when requested by NAVMED East or NAVMED West to support other NRMP holders. If a commanding officer or officer in charge deems such support is hazardous to their own command responsibilities, refer the matter to BUMED for resolution.

(9) Ensure NAVMCPUBHLTHCEN inspectors receive access to personnel, spaces where radioactive material is used, and all supporting documentation during unannounced and announced NRMP inspections. Additionally, the commanding officer, officer in charge or their designee shall attend the inspection in brief and out brief.

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6. Action. Naval medical department activities using permitted radioactive material shall:
- a. Operate under conditions specified in the applicable NRMP and companion tie down documents.
 - b. Coordinate all questions or reports concerning radioactive material use with the NRSC via the NAVMCPUBHLHCEN.
 - c. Submit all requests for NRMP changes or amendments to the NRSC via the chain of command and NAVMCPUBHLHCEN. Direct transmittal to the NRSC or the NRC is not authorized, except in emergency situations.
7. Records. Records created as a result of this instruction, regardless of media and format, shall be managed per SECNAV M-5210.1 of January 2012.
8. Reports. The reports required in this instruction are exempt from reports control per SECNAV M-5214.1 of December 2005, part IV, paragraph 7k.



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