



DEPARTMENT OF THE NAVY
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13 FEB 2004

From: Commanding Officer, Navy Environmental Health Center
To: Distribution

Subj: RECEIPT, STORAGE AND SECURITY OF RADIOACTIVE MATERIALS

Ref: (a) Title 10, Code of Federal Regulations (CFR), Part 19, Part 20 and Part 35
(b) NUREG 1556, Consolidated Guidance About Material Licenses, Volume 9, Program-Specific Guidance About Medical Use Licenses

Encl: (1) Naval Radiation Safety Committee Bulletin 2004-01, Receipt, Storage and Security of Radioactive Materials

1. The security and control of radioactive material is a prime concern of the Naval Radiation Safety Committee (NRSC), who manages the Naval Master Materials License issued to the Navy by the Nuclear Regulatory Commission.
2. An incident where radioactive material was left unattended in an unrestricted area for several hours occurred at a Naval medical center recently. Several factors contributed to this event including the vendor placing an incorrect address on the package, the courier delivering the package to the center's loading dock vice the address on the package, and loading dock personnel not knowing the command's policy on receiving and processing radioactive material. As a measure to prevent similar incidents in the future, the NRSC is directing medical activities which possess a Naval Radioactive Material Permit to perform specific actions as discussed and delineated in the enclosed NRSC Bulletin 2004-1.
3. The enclosed NRSC Bulletin also requires a written response to this command by 12 March 2004, describing the procedures and actions the command has taken in implementing these actions. Any questions pertaining to the requirements of this letter can be directed to LCDR Brian Pomije, commercial (757) 953-0766/0768 or DSN 377-0766/0768, facsimile (757) 953-0685 or e-mail at pomijeb@nehc.med.navy.mil.

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References:

- (a) Title 10, Code of Federal Regulations (CFR), Part 19, Part 20 and Part 35
- (b) NUREG 1556, Consolidated Guidance About Material Licenses, Volume 9, Program-Specific Guidance About Medical Use Licenses

Purpose

1. The Naval Radiation Safety Committee (NRSC) is issuing this bulletin to provide guidance and direction concerning the security and control of radioactive material (RAM) as required by references (a) and (b).

Discussion

1. Security and control of radioactive material is a prime concern of the Naval Radiation Safety Committee. Radiation Safety Officers (RSOs) and staff must institutionalize procedures and instill a culture within the command that ensures the security and control of radioactive material. This will ensure compliance with regulations and assist in keeping personnel exposures (employees and public) to a minimum. Given the events of September 11, 2001, it is even more prudent to maintain a high level of alertness to security-related matters, ensuring radioactive material is not acquired by terrorists.

2. Control and security of RAM begins at the time you order it. To ensure that the RAM is properly received by your activity, it is critical to provide the distributor proper shipping instructions and the correct address to which the RAM should be shipped. The delivery address should include the command's name and address, including the building and room number. Many commands now use government credit cards to order RAM. When doing so, the distributor will default to the billing address of the credit card. This means that if you use the supply department's credit card to order RAM, the distributor will ship the material to the hospital's main supply office or the loading docks, unless they are provided specific written directions to the contrary. RAM should be shipped and delivered directly to radiation safety personnel to ensure that the material will be properly handled, processed, and secured.

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3. The first line of defense in ensuring the security and control of RAM is to provide appropriate radiation safety training/instructions to individuals at their command.

Individuals that obviously require training are those that routinely work with and are directly involved with the shipping and/or receipt of RAM. These individuals include Nuclear Medicine and Radiation Safety staff. However, training is also required for those individuals who have a potential to come in contact with RAM. This includes supply/loading dock personnel, housekeeping, the OOD/CDO duty staff, and emergency response personnel such as firefighters and security personnel. These individuals should be familiar with how to identify RAM, their command's procedures for receiving RAM, and should be able to contact the correct individuals authorized to receive the RAM, or should be able to escort/direct the courier to the proper delivery location. Normal package receipt areas, such as loading docks, should be posted with instructions to follow in the event a package containing RAM is delivered to, or discovered at these locations, as a continuous reminder to employees.

4. In addition to ordering and receiving packages containing radioactive materials (RAM), it is also critical that these sealed and unsealed sources are under control and/or constant surveillance. This is accomplished by having a qualified individual present whenever RAM is being used. When RAM is not being used, it should be properly secured from unauthorized access or removal. This is typically accomplished by storing the RAM in a restricted area in which each access is secured with either a cipher or key-entry lock, that only individuals authorized by the RSO have access to. It should be verified that no unauthorized individuals, such as housekeeping staff, have access to the restricted space via a master key or combination. In the event that the primary barrier is left unsecured or intentionally or unintentionally defeated, high activity (high risk) radioactive materials such as those used in brachytherapy shall additionally be secured in a locked safe or cabinet, preventing unauthorized access or unintentional exposure from ionizing radiation.

5. Any questions pertaining to this Bulletin can be directed to LCDR Brian Pomije at Navy Environmental Health Center (NAVENVIRHLTHCEN), Commercial (757) 953-0766/0768 or DSN 377-0766/0768, facsimile (757) 953-0685 or e-mail at pomijeb@nehc.med.navy.mil.

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Action

This bulletin requires each permittee by **12 March 2004**, to respond to the Navy Environmental Health Center (NAVENVIRHLTHCEN) with the statements (commitments) and information requested below. The response shall be forwarded as a formal letter, and a copy of this response will be maintained with the command's Naval Radioactive Materials Permit (NRMP). It will be considered an integral part of the permit along with your permit application, amendments and other correspondence. The response letter shall be signed by the Commanding Officer of the medical treatment facility or a member of management with "by direction" authority for such matters, other than the RSO.

1. **Action:** Commands shall review and evaluate their procedures for ordering, receiving and processing radioactive materials to ensure they provide a high level of security and control. Ensure that the procedures include:

- (a) notifying the manufacturer/distributor, in writing, of specific delivery instructions, such as the individual (i.e., RSO or designee) to whom the package shall be delivered to; and
- (b) the address the material shall be delivered to, including building and room number as applicable.

These procedures shall be formally written in an instruction or SOP and forwarded as an enclosure to the formal response letter to NAVENVIRHLTHCEN.

2. **Action:** Commands shall post placards in the loading dock/supply receiving areas of their command, giving specific instructions on:

- (a) how to recognize a package containing RAM;
- (b) what action(s) to take; and
- (c) who to contact in the event that a RAM package or a courier delivering a package labeled as RAM is discovered.

Commands shall state in their response letter to NAVENVIRHLTHCEN the status in completing this action, including a description and wording of the placard.

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3. Action: Commands shall review and evaluate their training program required by 10 CFR 19.12 to ensure that the extent of the instruction is commensurate with the potential radiological health protection problems present in the work place. Ensure that the training includes, but is not limited to, OOD/CDO duty staff, supply/loading dock personnel, emergency responders (i.e., firefighters, etc.), security personnel, and housekeeping staff. These training requirements are further discussed in NUREG-1556, Vol. 9, Appendix J, "Training for Ancillary Staff". If ancillary staff have not received training in the last 3 months, provide refresher training as soon as possible. Commands shall state in their response letter to NAVENVIRHLTHCEN:

- (a) the specific actions performed in reviewing and evaluating their training program and the results;
- (b) the number of personnel (by worker type) who received training directed by this Bulletin; and
- (c) the number of personnel who still require the training directed by this Bulletin.

4. Action: Commands shall evaluate the security of the radioactive material in their possession and ensure the following is accomplished:

- (a) Each area where either radioactive materials or radioactive waste are being stored, shall be properly secured by either a cipher lock, key lock, or equivalent security measures, such that no unauthorized persons shall have access to the radioactive materials or radioactive waste. Locking mechanism shall be designed such that the door shall automatically lock upon closure without the need for a key, combination, etc., and the key or combination is not considered a "master", such that multiple individuals may unnecessarily have access to the space.
- (b) High activity radioactive materials shall be stored or contained in a secure safe or locked cabinet within the secured storeroom described in paragraph (a) above. These safes and/or cabinets should be shielded if necessary, and labeled as containing radioactive materials. Radioactive materials that fit into this category are those that fall into the reporting requirements of 10 CFR 20.2201(a)(i); i.e., permitted material in an aggregate quantity equal to or greater

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than 1,000 times the quantity specified in Appendix C to
10 CFR Part 20.

Commands shall state in their response letter to NAVENVIRHLTHCEN
the specific actions performed in evaluating the security of RAM
in their possession and the status of actions in paragraphs (a)
and (b) above.

Approved by: D. E. Farrand
CAPT, MSC, USN
Executive Secretary
Naval Radiation Safety Committee
Office of Chief of Naval Operations (N455)