

Radiation Safety Policy on Non-Compliance

This policy on non-compliance is designed to encourage the participation and cooperation of users of radioactive material, and to ensure that the use of such material is consistent with state and federal regulations, university policy, conditions of our radioactive material license, and safe practices.

In the event that non-compliance with radiation safety program policies and practices is identified, a laboratory audit report will be issued by the Radiation Safety Office, EH&S to the permit holder of the authorization. A time-table for correcting the item of non-compliance will be identified in the audit report, unless the item of non-compliance was corrected at the time of the laboratory inspection.

If the noted problem is corrected, and the violation is not severe, no further action is usually necessary. If the problem is not corrected during the corrective action time-frame, and is identified on the next EH&S laboratory inspection, a sanction suitable to the severity level of the violation will be applied.

Violations are classified into 3 severity levels: minor, moderate, severe. The severity levels are derived from Nuclear Regulatory Commission regulations and from UCSB's recent safety history. The campus Radiation Safety Manual should be consulted for clarification or more information on policies and procedures. Irrespective of the severity level, all violations must be corrected.

Spills and accidents are not considered violations, unless they are the result of a failure to comply with conditions of an authorization's approved protocol or radiation safety policy and practices.

Violations listed here are not all-inclusive. The list may change as deemed necessary by the Radiation Safety Committee.

Minor Violations:

Laboratory Records

1. Radioisotope use logs not completed
2. Survey records not maintained or incomplete
3. Surveys not conducted with proper instruments

Radioactive Material Use and Storage

4. Radioactive material (RAM) containers not properly labeled
5. RAM not properly shielded
6. RAM work surfaces not properly covered during use
7. Survey meters not calibrated or unavailable for use
8. Dosimeters not worn when appropriate
9. Potentially contaminated items not properly labeled
10. Lab coats, gloves not worn when using radioisotopes

11. Prohibited items in radioactive waste container

Sanctions for minor violations:

When four minor violations have occurred with the calendar year:

1. Radiation safety office staff meet with the permit holder and laboratory personnel as part of a refresher training session.
2. Written notice sent to the authorization permit holder.
3. Failure to take corrective actions within the requested time frame will result in the authorization's suspension of radioisotope ordering/receiving until corrective actions have been implemented.

Moderate violations:

1. Storage or use of food, drink or cosmetics in a radioisotope use area
2. Failure to properly secure radioactive material
3. Use or storage of radioactive material in an unauthorized area
4. Contamination levels outside of exclusive use areas of lab greater than the contamination limits of the campus Radiation Safety Manual
5. Improper disposal/release of radioactive material (e.g., sink, prohibitive items in containers).

Sanctions for moderate level violations:

When two moderate violations have occurred in a calendar year:

1. Radiation safety staff meet with the permit holder and laboratory staff as part of a refresher training session.
2. Written notification sent to the authorization permit holder by the RSO, with a copy sent to the department chair.
3. Failure to take corrective actions within the requested time frame will result in the termination of radioisotope ordering privileges until corrective measures have been implemented.

Severe violations:

1. Intentional falsification of required radiation safety records
2. Failure to immediately report known loss or theft of radioactive material
3. Unauthorized external shipment or receipt of radioactive material from an external source (i.e., unapproved transfer of radioactive material)
4. Radioactive material use not in accordance with the type of investigation specified in the radioactive material authorization
5. Failure to respond to a written notice from the RSO for corrective actions.

Sanctions for a severe violation:

1. Immediate notification of authorization permit holder by the RSO.

2. Written notice sent to the authorized permit holder and the authorized user's department chair and the Radiation Safety Committee Chair.
3. Suspension of radioisotope ordering/receipt privileges until corrective actions are implemented to the satisfaction of the RSO and the Radiation Safety Committee.
4. Possible suspension/termination of authorization to use radioactive material following review by the Radiation Safety Committee.
5. Prior to reinstatement of the authorization, authorized permit holder and laboratory personnel attend a radiation safety refresher session.