Radiation Safety Committees

Colin Dimock
AVC–Environment, Health & Safety
UCLA

Why Do We Have a Committee?

• Why Would You Have a Committee?
• What Does the Committee Do For the Program?
• How Do You Build an Effective Committee?
• Balancing Roles

Radiation Safety Committees

(1) The license includes two or more different types of uses of byproduct material
• 10CFR35.24(f)
• Unsealed Radioactive Material – Written Directive Required
• Manual Brachytherapy
• Photon Emitting Remote Afterloader Units, Teletherapy Units, and Gamma Stereotactic Radiosurgery Units
Why Do We Have a Committee?

(2) The license is a Type A Broad Scope License
   • 10CFR35.15
   • Grants a much higher level of flexibility and authority to the licensee.
   • Requires a higher level of local oversight
   • Generally granted to research or larger operations with a history of compliance and strong local controls

Why Do We Have a Committee?

(3) The facility is conducting human use research
   • FDA Regulated
   • Committee is responsible for reviewing and approving all research protocols involving radiation, including machine produced radiation

Why Do We Have a Committee?

(4) As an internal control to improve safety and compliance
   • Voluntary program or in preparation for an application for a Broad Scope License
The Structure of the RSC

Membership

• 10CFR35.24(f)
• An Authorized User of each type of use permitted by the license
• The Radiation Safety Officer
• A representative of the Nursing service
• A representative of Management (non RSO, AU)
• Others as desired

Charter or Bylaws

• 10CFR33.13 & NUREG 1556 8.7.2
• A Chairperson – with knowledge, authority, and time to be able to effectively lead the Committee
• A Quorum
• An established meeting frequency
• Meeting Minutes

Committee Responsibilities

• Review personnel dosimetry data
• Results of required radiation surveys
• ALARA reviews
• Periodic audits of the program
• Approve and review Authorized Users
• Evaluate new uses of by-product material
• Review spills, incidents and medical events
Benefits of the RSC

“Hidden” Benefits

• Relieves the RSO of sole responsibility
• Breaks down the “administration vs. faculty/physicians” barrier
• Provides programmatic flexibility
• Provides authority for escalated enforcement
• Creates champions for engagement
• Establishes the three elements that support the program
  • The RSO, the RSC, and Management Representation

RSC Membership

Characteristics to look for

• Not too passive!
• Not too reckless
• A Chairperson that manages the Committee
• Balanced across important departments
• Politically connected & respected
• Management Representation that is engaged
• Those that decline to serve can still be helpful in finding other good options

Balancing the Roles

The three legs of the stool

• The RSO
  • The regulatory and technical expert
  • The active arm of the program
• The RSC
  • The group that sets policy and makes exceptions
  • The key for peer to peer influence and enforcement
• The Management Representative
  • Provides resources
  • Provides management buy-in and oversight
Balancing the Roles

The three legs of the stool

- The RSO + Management
  - Appoints committee members
  - Keeps the program in compliance
- The RSC + Management
  - Selects the RSO
  - Keeps the program from decay and complacency
- The RSC + the RSO
  - Pushes management for needed resources

Thank You

Colin Dimock
AVC–Environment, Health & Safety
UCLA