

Radiation Safety Committees

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Radiation Safety Committees

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

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Why Do We Have a Committee?

- (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

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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

The Structure of the RSC

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

The Structure of the RSC

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

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Thank You

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