

University of Cincinnati
Radiation Safety Committee
Policy Statement 04-1C

Policy Concern: This policy clarifies the responsibilities of authorized users (AU) and other supervisors in ensuring selected classifications of radiation workers obtain initial training and attend retraining as required by regulation or license condition. This policy clarifies the fundamental procedures used by the Radiation Safety Office (RSOf) for scheduling training courses for radiation workers and notifying authorized users and/or supervisors of a radiation worker needing to attend retraining. This specific policy applies to *HDR Users*.

Policy Implementation: The Radiation Safety Officer (RSO) is directed to implement this policy upon approval by the Radiation Safety Committee (RSC) and to use this policy as guidance when implementing training requirements listed in the Radiation Control and Safety Program (RCSP).

Discussion: RAM radiation workers are individuals who may handle radioactive material under the RCSP. Under the RCSP, *RAM Radiation Workers* must complete the initial radiation safety training process prior to handling radioactive material. Each calendar year *RAM Radiation Workers* are required to attend an initial training course or a retraining course. These training requirements are a condition of the University of Cincinnati medical broad scope license.

In 2004 the RSC approved RSC Policy 04-1 to cover initial and retraining requirements for *RAM Radiation Workers* and *Health Care Radiation Workers*. The RSC approved the policy May 19, 2004. In August 2005, the Ohio Department of Health enacted revised regulations. The revised regulations included new training requirements for *Health Care Radiation Workers* and a subgroup of *RAM Radiation Workers*, *HDR Users*. Therefore, the initial policy was split into three policies RSC Policy 04-1A, RSC Policy 04-1B and RSC Policy 04-1C. RSC Policy 04-1A applies to *RAM Radiation Workers*. RSC Policy 04-1B applies to *Health Care Radiation Workers*. RSC Policy 04-1C applies to *HDR Users*.

Policy Definitions

<i>Annual:</i>	Once per year, at about the same time each year, plus or minus one month,
<i>Calendar year:</i>	January 1 through December 31.
<i>Health Care Radiation Worker:</i>	An individual who provides physical care to a patient under radiation precautions.
<i>HDR User:</i>	A RAM Radiation Worker who has obtained the permission and additional training to operate a high dose rate remote afterloader (HDR).
<i>RAM Radiation Worker:</i>	An individual who handles radioactive material or radioactive waste, or performs surveys to detect radioactive contamination under the University of Cincinnati RCSP.
<i>Supervisor:</i>	For <i>HDR Users</i> the supervisor is the AMP and/or AU under whose authorization the individual is operating the HDR.

Initial training:

For *RAM Radiation Workers* this is the combination of the Basic Course and the Advanced Course. For an *HDR User* this includes additional training in the specific HDR's operating and emergency procedures.

Retraining:

For RAM radiation workers this is any RSO approved RAM radiation worker retraining course. For an *HDR User* this includes additional annual training in the specific HDR's operating and emergency procedures.

Policy Statement – HDR Users

(1) All potential *HDR Users* shall prior to performing duties as an *HDR User*:

- a. Attend *initial training* required for a RAM Radiation Worker as outlined in RSC Policy 04-1A)
- b. Obtain vendor or vendor equivalent training from an AMP.
 - i. The training must include HDR operations and emergency training.
 - ii. The AMP shall maintain training records of the training.
 1. The training records shall at a minimum include the topic(s) covered, the date of training, the name(s) of attendee(s), and the name(s) of individual(s) who provided the training.
 2. A copy of the training records shall be maintained with HDR records.
 3. A copy of the training records shall be provided to the RSO of prior to the individual acting as an *HDR User*.

(2) All *HDR Users* shall maintain RAM radiation worker status and must attend an *initial training* or appropriate *retraining* course each calendar year in accordance with RSC Policy 04-1A.

(3) To maintain the additional *HDR User* status an individual shall complete *annual* HDR training.

- a. The training shall:
 - i. Include HDR operations and HDR emergency instruction
 - ii. Be obtained from an AMP
 - iii. Have records maintained by the AMP
 1. The records shall at a minimum include the topic(s) covered, the date of training, the name(s) of attendee(s), and the name(s) of individual(s) who provided the training.
 2. The AMP shall maintain a copy of the training records with HDR records.
 3. The AMP shall provide a copy of the training records to the RSO of within seven (7) days of training presentation.
- b. The *HDR User* status of individuals who have not met their *annual* HDR retraining within 395 days of their previous HDR operations and emergency procedure training shall be suspended effective on the 396th day. (e.g., individual whose last attended training on October 1, 2005 does not attend an HDR operations and emergency training by November 1, 2006 suspension will be effective November 2, 2006)
 - i. The RSO shall notify individuals of their suspended *HDR User* status. Notification shall be by memorandum sent via campus mail no later than the first week of the month following the date of suspension.

- ii. The RSO shall notify *Supervisors* (e.g., AU) of an individual's suspended *HDR User* status. Notification shall be by copy of the memorandum to the *HDR User*.
- c. Individuals who have not met their retraining obligation by the first RSC meeting following suspension of the individual's *HDR User* status shall have their *HDR User* status deactivated.
 - i. The RSC Chair shall notify individuals of their deactivated *HDR User* status. Notification shall be by memorandum sent via campus mail within one week of the RSC meeting.
 - ii. The RSC Chair shall notify *Supervisors* (e.g., AU) of an individual's deactivated *HDR User* status. Notification shall be by copy of the memorandum to *HDR User* and sent via campus mail within one week of the RSC meeting.
 - iii. The RSC shall instruct the RSO to cancel the *HDR User* status for any individual who had their *HDR User* status deactivated by the RSC. *HDR User* cancellation shall be processed by the RSO within one week of the RSC meeting.
- (4) Prior to reinstatement of *HDR User* status an individual must bring their training status up-to-date and provide the documentation and associated reinstatement paperwork to the RSO.
- (5) Retraining reminders
 - a. Each July the RSO shall provide *Supervisors* (e.g., AU) with a report listing all individuals currently under their supervision and any radiation safety courses the individuals have attended.
 - b. Monthly the RSO shall by the end of each month send via campus mail to each applicable *Supervisor* (e.g., AU) a list of individuals under their supervision who need to complete their *HDR retraining* during the following calendar month.
- (6) *Supervisor* (e.g., AUs) responsibilities include, but are not limited to:
 - a. Ensuring each potential *HDR User* obtains required *initial training* for a *RAM Radiation Worker* prior to performing any activity involving the HDR.
 - b. Ensuring each potential *HDR User* receives required initial *HDR User* training from a qualified AMP prior to performing any activity involving the HDR.
 - c. Ensuring the *HDR User* properly completes and submits a current Radiation Worker/Dosimetry Application form (RS Form 2.0) to the RSO. The RS form 2.0 submitted must include the *Supervisor's* (e.g., AU's) signature.
 - d. Ensuring the *HDR User* attends appropriate *retraining* courses, as needed.
 - e. Ensuring *HDR User* schedules attendance at an *initial training* or *retraining* course presented by the RSO at least 24 hours prior to the scheduled course time.
 - f. Notifying the RSO when an individual should no longer be considered an *HDR User* and/or *RAM Radiation Worker* under the *Supervisor*. (This notification may be via email to the RSO or submission of Radiation Worker/Dosimeter Application form, RS Form 2.0)

Approval

Initial policy 04-1 approved by Radiation Safety Committee May 19, 2004

Revision approved May 17, 2006