



**DEPARTMENT OF THE NAVY**  
NAVY ENVIRONMENTAL HEALTH CENTER  
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6470  
Ser OEM/ **001445**  
06 JAN 2004

From: Commanding Officer, Navy Environmental Health Center

Subj: NAVAL RADIOACTIVE MATERIAL PERMIT (NRMP) INFORMATION NOTICE  
2004-01: ADDITIONAL RESPONSIBILITIES OF THE RADIATION SAFETY  
COMMITTEE

Ref: (a) Naval Radioactive Material Permit (NRMP) Bulletin, 6470 Ser OEM/000318 dtd 19  
March 2003.  
(b) Title 10, Code of Federal Regulations (CFR), Part 35; Medical Use of Byproduct  
Material.

1. On 19 Mar 2003, a bulletin (6470 Ser OEM/000318) was released providing guidance on how to implement new Part 35 (references (a) and (b)). This information notice is to provide further guidance on the responsibilities of the Radiation Safety Committee.

2. The following information was addressed in the bulletin: 10 CFR 35.24, *Authority and Responsibilities for the Radiation Protection Program*. This section requires only permittees that are authorized for two or more different types of uses of byproduct material under Subparts E, F, and H to establish a Radiation Safety Committee (RSC). In addition to this Nuclear Regulatory Commission (NRC) requirement, the Navy Radiation Safety Committee (NRSC) will also require permittees that use byproduct material under Subparts D and/or G to establish an RSC at their command. Also, this section of the new Part 35 only specifies the membership of the RSC. It does not address the RSC's responsibilities. Permit renewal applications shall include a copy of the implementing instruction that describes the command's RSC membership and responsibilities. Minimum permittee's RSC responsibilities shall be as follows:

(a) Meet at least quarterly;

(b) Review, on the basis of safety and with regard to the training and experience standards in Subpart J of this Part, and approve or disapprove any individual who is to be listed as an authorized user (AU), an authorized nuclear pharmacist (ANP), an authorized medical physicist (AMP), the Radiation Safety Officer (RSO), or a teletherapy physicist before submitting a permit application or request for amendment or renewal;

(c) Review, pursuant to Sec. 35.13 (b)(1) through (b)(4), on the basis of the board certification, the license, or the permit identifying an individual, and approve or disapprove any individual prior to allowing that individual to work as an AU, ANP or AMP; and

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(d) Review on the basis of safety, minor changes in radiation safety policies and procedures not requiring a permit amendment per 10 CFR 35.13. Approve with the advice and consent of the RSO and the management representative, or disapprove the changes.

(e) Review quarterly, with the assistance of the RSO, a summary of the occupational radiation dose records of all personnel working with byproduct material, including nursing staff and any other monitored individuals. Additionally, posted dosimetry and radiation survey measurements shall also be reviewed quarterly;

(f) Review quarterly, with the assistance of the RSO, all incidents involving byproduct material with respect to cause and subsequent actions taken; and

(g) Review annually, with the assistance of the RSO, the radiation safety program.

3. The permittee's RSC will also meet the following requirements, in addition to those responsibilities described above:

(a) A quorum will be established for each meeting. To establish a quorum and to conduct business, at least one-half of the Committee's membership must be present, including the Radiation Safety Officer and the management's representative.

(b) The minutes of each RSC meeting must include:

- 1) The date of the meeting;
- 2) Members present;
- 3) Members absent;
- 4) Summary of deliberations and discussions;
- 5) Recommended actions and the numerical results of all ballots; and

(c) Review quarterly, recommendations on ways to maintain individual and collective doses as low as reasonably achievable (ALARA);

(d) Review quarterly, types and amounts of byproduct and accelerator produced material used by the command. This shall be summarized in table format.

(e) Review quarterly, changes in radiation safety procedures and safety measures. The changes shall be maintained as required in 10 CFR 35.2026.

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(f) Review quarterly, continuing education and training for all personnel who work with or in the vicinity of byproduct material.

4. The responsibilities and requirements of the permittee's RSC shall be listed in the permittee's "command instruction" which governs the implementation of their radiation safety program. Alternatively, the command's instruction may reference this NRMP Information Notice. In addition, any changes or revisions to the command's instruction shall be forwarded to Navy Environmental Health Center (NAVENVIRHLTHCEN) within 30 days. This need not be sent as an amendment to the NRMP.

5. For additional information, please contact the Radiation Health Team Leader, LCDR Pam Fetherston, MSC, USN at DSN 377-0766 or (757) 953-0766, Fax (757) 953-0685, [fetherstonp@nehc.med.navy.mil](mailto:fetherstonp@nehc.med.navy.mil) or [pomijeb@nehc.med.navy.mil](mailto:pomijeb@nehc.med.navy.mil).

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By direction

Distribution:

All Medical NRMP Radiation Safety Officers

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NSHS Portsmouth VA (Attn: Clinical Nuclear Medicine School)