

Kansas State University  
Radiation Safety Compliance Policy

In order to ensure that the University is meeting the requirements of our State License for the possession and use of radioactive materials, we must have a means to ensure compliance with the State Regulations and K-State Policies. This is a difficult issue and the need to facilitate academic freedom to conduct research must be balanced with the need to enforce regulations and policies. As stated in the Radiation Safety Plan, this enforcement is the duty of the Radiation Safety Office (RSO).

A policy is now made to establish a clear schedule of compliance that will serve as a guideline for the RSO and an advance notice to the authorized user. It is the intent of this policy that all parties will know in advance that certain actions (or lack thereof) will bring specific responses from the RSO. This policy will be published in the next revision of the Radiation Safety Manual.

A system of notification is hereby established that allows a short, but uniform response time to an initial notice. Failure to respond within that time triggers a second notice that is sent to the user and the user's supervisor (department head or other appropriate person) and copied to the chairperson of the Radiation Safety Committee (RSC). It is the intent of this second notice that the user will receive a reminder from his/her supervisor and also, in the event that the user is out of town, the supervisor can inform the RSO of the status of the lab. If no response to the second notice is received from either the user or the user's supervisor within the same timeframe as the first notice, a third notice is sent to the user and the user's supervisor and copied to the dean of the user's college, the chairperson of their college's safety committee, and the RSC chairperson. If the third notice does not generate a response within the same timeframe, the permit will be suspended, any existing radioisotope in the lab will be removed, and the RSC will review the situation and consider further action. The following table shows some issues of compliance and the timeframes for response.

<b>Type of Notice</b>	<b>Response Timeframe</b>
Inspection Violation Letters	30 days
Quarterly Inventory Report Forms	14 days
Other issues (including training notices)	As stated in the notice

One of the largest compliance issues at a facility of this size is with basic Radiation Safety Training. As part of this compliance policy, the RSO will send a notice in the form of a letter or memo to all users with staff that need training. The response timeframe mentioned above will apply with the follow-up notices as detailed above. Additionally, the user will be denied delivery of new radioisotope.

Another issue is with violations that are cited in the course of a lab inspection. As detailed in the table above, the user has 30 days to correct a violation and respond to the violation letter. A repeat violation triggers a follow-up inspection in 30 days and if the violation is not corrected at that time, the lab will be closed and the permit suspended until review by the RSC. Additionally, the RSO will keep track of violations and users with frequent occurrences will be discussed at a subsequent RSC meeting and may be considered for sanctions such as limits on their authorization or non-renewal of their permits.

Finally, there is the issue of flagrant violation of K-State Policies or State Regulations. These violations represent an immediate threat to the health and safety of lab personnel or the environmental conditions of the University and should result in immediate suspension of the permit and subsequent review by the RSC prior to re-instatement of the permit. The following items are offered as examples of flagrant violations:

- Receipt of radioisotope without authorization or initial inspection (and inventory logging) of the package by the RSO.
- Use of radioisotope with disregard for personal safety (without protective equipment, etc.) or the safety of other personnel in the lab.
- Use of radioisotope by a lab member who has not been issued personal dose monitoring equipment when required by the approved isotope or procedure in the lab. This violation shall also apply to persons who have the dose monitoring equipment but repeatedly (more than one instance) fail to use it.
- Use of radioisotope by a lab member who has not received the computer-based radiation safety training as evidenced by a certificate bearing the personal identification number of the recipient.
- Failure to report or clean up a radioisotope spill.