



Nevada Division of Public and Behavioral Health Technical Bulletin



Topic: Personnel Dosimetry Records for Licensees and Registrants

Section/Program/Contact: Karen Beckley, Manager, Radiation Control Program

To: Nevada Radiation Control Program Radioactive Materials (RAM) licensees and Radiation Producing Machine (RPM) registrants.

Date: March 27, 2015

The information contained in this bulletin is for all Nevada radioactive material licensees and radiation producing machine registrants under the Nevada Revised Statute (NRS) chapter 459 and Nevada Administrative Code (NAC), Chapter 459.

The Radiation Control Program (RCP) which is part of the Department of Health and Human Services, Division of Public and Behavioral Health has noted that there is a question in regards to the requirements of the licensee or registrant to provide their workers, whom are exposed to occupational radiation, personnel dosimetry and the record keeping practices for the licensee or registrant in this matter. The RCP enforces the compliance with the (NRS) chapter 459 (Hazardous Material) and the NAC chapter 459 (Hazardous Material) with regards to the following provided information.

Licensees or Registrants:

With concurrence from the Nuclear Regulatory Commission (NRC) and the Nevada Attorney General the verbiage in NRS 459 & NAC 459 will be enforced in the following manner:

- 1. All licensees or registrant shall monitor occupational exposure to radiation from licensed and unlicensed sources under the control of the licensee or registrant. The licensees or registrant shall maintain records of doses received by each person monitored.** Records may be kept at the licensee's or registrant's facility, at another company location, or by a designated third party. The records may be paper, electronic, or in another suitable form. The facility must be able to demonstrate that the records are being maintained appropriately in regards to security (i.e. records are not being lost, stolen, or destroyed) and must be made available to an inspector at the time of inspection. It is the responsibility of the licensee or registrant that all records are accurate and complete. If issues (i.e. server problems, password problems, lost, or misplaced records) arise that prevent the records from being reviewed during an inspection, the licensee or registrant will be cited for violations of NAC 459

2. **The Radiation Safety Officer (RSO) of the licensee or registrant is responsible for ensuring that all occupational exposures are reviewed in a timely manner, maintained within acceptable limits, and to investigate unexpected or excessive exposures.** If records are being kept electronically or by a third party there needs to be documentation that the RSO of the licensee or registrant has reviewed occupation exposure records. When licensees or registrants employ workers who receive occupational exposures at other facilities, it is the licensee or registrant's responsibility to receive the worker's occupation dose records from the other facilities in order to ensure the worker has not exceeded an annual dose limit.

3. **Each licensee and registrant shall advise each of its workers annually of their exposure to radiation and or radioactive materials. Data concerning a person's exposure to radiation and the results of any measurements, analyses and calculations of radioactive materials deposited or retained in the body of a person must be reported in writing to him or her.** Regardless of how these records are maintained, there must be documentation showing that each person received the results of their exposure to occupational radiation. When determining a person's annual exposure to radiation, licensees and registrants are required to include occupational doses that the person received during the year while employed by other person(s) or facilities. If the facility chooses to provide a dosimeter for each of their employees/contractors while at their location, the licensee/registrant must provide documentation of consultation with the employee that covers the dose received at their facility and the importance of the employee providing all other occupational dosimetry reports to the employer.

If you have any questions please consult the NAC Chapter 459 and/or call RCP at 1-775-687-7550. You are our customers and we are here to serve you, the regulated community, in regards to safety in the radiation area.