



Nevada State Health Division Technical Bulletin



Topic: Authorized User (AU) and Supervised Users (SU) responsibilities

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

TO: 10 CFR 35 Radioactive Materials (RAM) Licensees

Date: May 3, 2012

The increase in 10 CFR 35 RAM Licensees using staffing agency technologists and student technologists has created a gap in understanding the regulations for the RAM licensed facility; specifically dosimetry and training requirements.

The use of Radioactive Materials (RAM) for medical use is regulated by the Radiation Control Program (RCP) by authority of NAC 459.3062 / 10 CFR 35.

The licensee must maintain dosimetry records for the radiation workers at the licensed facility (NAC 459.332). If dosimetry is supplied by another source, the records are required to be kept at the licensed facility for radiation worker knowledge (NAC 459.786) and RCP inspections.

The State of Nevada RCP currently does not license Technologists; AUs are licensed to use or supervise the use of RAM. The supervision for the use of RAM is explained in 10 CFR 35.27. The qualifications and training of the AUs and the SU are verified through routine inspections. This training must include the requirements of 10 CFR 35.27 and be documented at the licensed facility.

10 CFR 35.27 is summarized as; A licensee that permits the receipt, possession, use or transfer of byproduct material by an individual under the supervision of an AU shall instruct the SU in the licensee's written radiation protection procedures, written directive procedures, regulations and the license conditions with respect to the use of byproduct material. The SU must follow instructions of the AU for the licensee's written radiation protection procedures, written directive procedures, regulations and the license conditions with respect to the use of byproduct material. A licensee that permits supervised activities is responsible for the acts and omissions of the SU.

The Radiation Protection Plan for the facility must address dosimetry and training for staffing agency technologists and student technologists. The RCP will be contacting these RAM licensed facilities and requesting a change to the Radiation Protection Plan to reflect these requirements.

Handwritten signature of Karen K. Beckley in blue ink.

SIGNATURE

May 3, 2012

DATE

Karen K. Beckley, MPA, MS
Manager, Radiation Control Program
Bureau of Health Care Quality & Compliance