Regulatory Oversight and References

HISTORY OF REGULATORY OVERSIGHT

In the 1960s Congress vested the Atomic Energy Commission (AEC), the predecessor of the Nuclear Regulatory Commission (NRC), with oversight and regulation of the possession and use of most radioactive materials.

The NRC has transferred regulatory authority over radioactive materials to several of the states, including Washington, by agreement between the NRC and the states. The NRC retains regulatory authority over federal facilities and nuclear reactors in all states.

The University established its Radiation Protection Program in the 1960s, prior to the construction of the University's TRIGA Reactor. (TRIGA stands for Teaching, Research, Isotope production, General Atomics nuclear research reactor.) The Washington Department of Radiation Protection issues and oversees the University's broad scope license and all radiation machine registrations.

The TRIGA reactor operates under a license issued by the NRC.

PRESIDENCE OF REGULATIONS

State regulations may be more stringent but never less stringent than federal regulations.

Policies established by the University Radiation Safety Committee may be more stringent than state regulations, but never be less stringent than federal or state regulations and/or any associated directives or license conditions.

The broad scope radioactive materials license provides the University with the flexibility to establish its own policies and procedures through the establishment and maintenance of its Radiation Protection Program. However, the Washington Department of Health (WA DOH) Office of Radiation Protection retains the right to, at any time, audit and inspect the University's programs, operations, and locations where sources of ionizing radiation are stored or used.

APPLICABLE FEDERAL REGULATIONS

The applicable federal regulations are Title 10, Parts 19, 20 and 35 of the Code of Federal Regulations located at:


10 CFR, Part 19

Notices, Instructions and Reports To Workers: Inspection And Investigations

This part establishes requirements for notices instructions, and reports by licensees to individuals participating in licensed activities.
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10 CFR, Part 19 (cont.)

Applicable section names and/or summaries are indicated below:

- 19.11: Posting of notices to workers.
- 19.12: Instructions to workers. Anyone who works in a restricted area must be provided training in radiation safety, be instructed to observe regulations and operating procedures, and report unsafe conditions.
- 19.14: Inspections. Presence of representatives...
- 19.15: Inspector consultation with workers...
- 19.16: Requests by workers for inspections. A radiation worker may request an inspection, and may talk with the inspector privately if he or she has identified a radiation safety problem and does not believe it has been properly dealt with.

10 CFR, Part 20

Standards for Protection Against Radiation

Applicable section names and/or summaries are indicated below:

- 20.1501: Surveys. Surveys must be made to demonstrate compliance with the regulations and to evaluate the potential for radiological hazard that may be present.
- 20.1801: Security. Radioactive material in controlled or unrestricted areas must be secured from unauthorized removal.
- 20.1901: Radiation symbol. The standard radiation symbol (tri-foil) is magenta, purple, or black on a yellow background.
- 20.1901 and 20.1902: Posting requirements. The appropriate posting depends on the dose rate or amount of radioactivity in the area or container.
- 20.1901, 20.1904, and 20.1905: Labeling requirements. Containers with greater than quantities listed in Appendix C of 10 CFR Part 20 must be labeled with:
  - The radiation symbol.
  - The words "Caution, Radioactive Material."
  - Appropriate precautionary information such as radionuclide, activity, date, dose rate at a specified distance, and chemical form.
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10 CFR, Part 20 (cont.)

- 20.1906: Receiving and opening packages.
- 20.2101: Records. Records must have measures recorded in units or multiples of curie, rad, and rem (e.g., mCi, dpm).
- 20.2201, 20.2202, 20.2203: Reports and notifications. Certain types of events require prompt reporting to regulatory authorities. Such events include the following:
  - Theft
  - Loss
  - More than a minor spill
  - Accidental release
  - Injury involving radioactive material

10 CFR, Part 35

Medical Use of Byproduct Material

This part is currently not applicable. Under the current state licensing or machine registrations, there is no approved use of ionizing radiation on or in humans.

APPLICABLE STATE REGULATIONS

The applicable state of Washington regulations are Title 246 of the Washington Administrative Code (WAC) located at:

apps.leg.wa.gov/wac/default.aspx?cite=246

Applicable chapter names in WAC Title 246 are:
- 246-220: Radiation protection—General provisions.
- 246-221: Radiation protection standards.
- 246-222: Radiation protection—Worker rights.
- 246-224: Radiation protection—Radiation machine registration.
- 246-225: Radiation protection—X rays in the healing arts.
- 246-227: Radiation protection—Industrial X ray.
- 246-228: Radiation protection—Analytical X-ray equipment.
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APPLICABLE STATE REGULATIONS (cont.) Applicable chapter names in WAC Title 246 (cont.):

- 246-229: Radiation protection—Particle accelerators.
- 246-231: Packaging and transportation of radioactive material.
- 246-232: Radioactive material—Licensing applicability.
- 246-235: Radioactive materials—Specific licenses.
- 246-247: Radiation protection—Air emissions.
- 246-249: Radioactive waste—Use of the commercial disposal site.

STATE LICENSES The following licenses are issued through the WA DOH:

Broad Scope License (WN-C003-1) The University's broad scope radioactive materials license is issued and renewed through the WA DOH Office of Radiation Protection, Radioactive Materials Licensing section. See:


The RSO provides a PDF copy of the current license upon written request by contacting the RSO. Send e-mail to:

radsafe@wsu.edu

Radioactive Air Emissions License (RAEL-004) The Pullman campus Radioactive Air Emissions License (RAEL) is issued as a part of the campus Air Operating Permit. The RAEL is issued and overseen by the WA DOH Office of Radiation Protection, Radioactive Air Emissions section. See:


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