Authorized User (AU) and Radiation Worker Training Enforcement Policy

[This training enforcement policy is independent of the ‘Radiation Safety Program Enforcement Policy’.]

This policy was approved by the Radiation Safety Committee (RSC) and became effective on 11/8/2000. This policy was recently updated, reviewed, and approved by the RSC on 1/18/2012.

Purpose

Our license agreement with the Ohio Department of Health requires initial and annual refresher training for all personnel working with radioactive material (RAM).

Since the new policy of continual, year-to-year Internet retraining has been implemented, fulfilling the retraining requirement can be efficiently accomplished by any staff member having access to the Internet. Retraining can also be accomplished in the RSOF.

Applicability

There are three categories of personnel to whom this policy applies:

- Authorized Users (AUs)
- Radiation Workers
- Ancillary Radiation Laboratory Workers

All AUs are required to take a three-hour initial training course at the RSOF before being approved as Authorized Users of radioactive materials. Annual retraining can be accomplished online or at the RSOF. Radiation workers (defined below) must undergo the same training as AU. Ancillary Radiation Laboratory Workers, as defined below, must undergo training each year either online or in person at the RSOF.

- **Radiation workers** – Personnel who work directly with radioactive material (RAM) and who are listed as radiation workers under an Authorized User (AU). These individuals must initially train by attending the new laboratory worker radiation safety training class before starting work in the laboratory or update training using the radiation worker retraining material on the Internet.

- **Ancillary Radiation Laboratory Workers** - Personnel listed under an Authorized User (AU) and who work in RAM laboratories but have only minor, incidental contact with radioactive material (RAM), such as dishwashers.
Initial training takes three-hours. The initial training must be completed and verified by a record or statement of completion provided to the RSOF within 30 days of beginning work with radioactive materials in AU's laboratories. Annual retraining is required.

These personnel are subject to the same retraining requirements as Radiation workers.

- **Non-Radiation Laboratory Workers** – Personnel listed as workers under an Authorized User (AU) who have no direct contact with radioactive material (RAM). As a minimal training requirement, Non-Radiation Laboratory Workers must take Laboratory Safety training within 30 days of starting work in the laboratory. Annual retraining is required.

It is the responsibility of the Authorized User (AU) to provide worker categories for all personnel to the RSOF by written memo or e-mail, and to update this list when changes occur.

Any individual that has not fulfilled his/her training obligation within 60 days of their yearly training anniversary must retrain in person.

**Pre-notification**

- Every AU will be informed of the expiration of his or her training at least 30 days before expiration occurs.
- AUs will also be informed simultaneously of the impending training expiration of their radiation workers or ancillary radiation laboratory workers. A list of consequences of training violations will accompany these notices.

(Note: Notices will be sent by email unless the individual does not have an email ID, in which CASE campus mail will be used.)

**Policy**

**AU Responsibility for Training of Their Workers**

AUs will be responsible for assuring that the training of their Radiation Workers and Ancillary Radiation Laboratory Workers is not delinquent.

Actions at 30 days overdue
- If AU’s training is 30 days delinquent:
Case Western Reserve University (CASE)
Department of Environmental Health & Safety (EHS)
Radiation Safety Office (RSOF)

- AU notified - Isotope ordering privileges suspended until resolved
- If an AU’s Radiation Worker’s or Ancillary Radiation Laboratory Worker’s training is 30 days delinquent:
  - AU notified - Worker not permitted to work with RAM
  - Isotope ordering privileges of the AU suspended until resolved

Actions at 60 days overdue
- If AU, Radiation Worker or Ancillary Radiation Laboratory Worker training is delinquent:
  - AU notified of impending action by email and phone
  - Unless resolved by agreement between the RSOF and the AU, approval of the RSC will be sought at the next Committee meeting to rescind authorization for radioactive material use and actions that will be taken to secure or confiscate radioisotopes possessed by the AU
  - AU and AU’s department chair or department administrator will be informed of Radiation Safety Committee action

Appeal Process

An AU will have the opportunity to appeal a decision made either by the RSO or by the RSC. The appeal will be a formal written response from the AU to the RSO who will consider the appeal in consultation with appropriate RSC members. The appeal will be acted on and the AU notified of the results within five working days of the receipt of the appeal by the RSO.

Approved: W. David Sedwick  Date: 1/18/2012