

**University of Southern California
Radiation Safety Committee
Non-Compliance and Enforcement Action Procedure**

The USC Radiation Safety Committee is responsible to ensure that radioactive materials and radiation-producing devices are used safely and in compliance with regulations and the conditions of the University’s Radioactive Materials License (License). This document establishes criteria that will be followed when infractions are identified.

The License specifies that the USC Radiation Safety Officer (RSO) has the duty and authority to immediately stop any operation involving use of radiation that 1) presents a significant hazard to the health and safety of personnel or the general public, or 2) is in clear violation of the California Radiation Control Regulations. Additionally, although different situations call for discretion in determining appropriate enforcement action depending on the magnitude of the offense, the following guidelines will be applied, as determined by the Radiation Safety Committee:

Tiered Enforcement

Level 1 – First offense. Permit Holders must respond in writing to the RSO within 30 days with corrective action. Acceptable corrective action should include re-training of all individuals involved in the offense to ensure that repeat violations do not occur. Violations involving special offenses (see below) could be advanced to Level 3.

Level 2 – Second offense in any 12-month period. Permit Holders are informed that the violation is a second offense and that a third offense will result in further disciplinary action including suspension of the Permit. The Permit Holder must respond in writing to the RSO within 30 days with a plan of action that corrects the violation and prevents recurrence. The plan will be presented to the Radiation Safety Committee for review and approval. Re-training is required.

Level 3 – Third offense in any 18-month period or continued non-compliance over a three-year period. A third successive violation or a pattern of repeat violations will result in a suspension of the Permit. The Permit Holder will be notified within 3 calendar days of the violation and will be required to provide a written plan of action within 15 days of notification that will prevent future violations. The Permit Holder will be asked to appear before the Committee to present the plan and show sufficient cause why his/her Permit should not be closed. The suspension will be in force from the date and time of official notification to the Permit Holder by the RSO until the Committee reinstates the Permit. Radioactive materials may be confiscated by the RSO during the suspension. Re-training by the RSO is required.

LEVEL	CORRECTIVE ACTION	TRAINING	SUSPENSION
1	X		
2	X	X	
3	X	X	X

Typical enforcement actions.

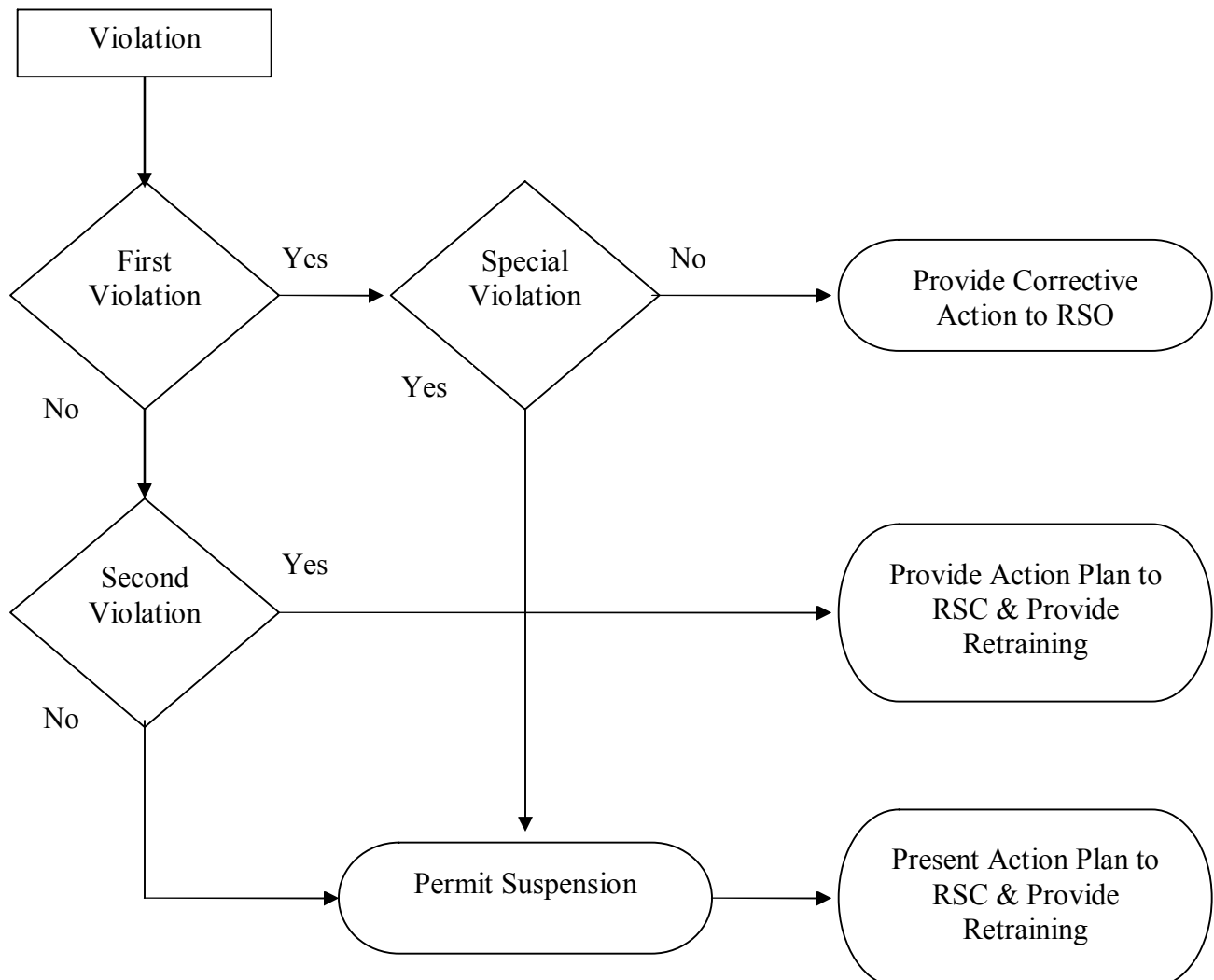
Special Violations

There are five violations that are of particular concern to the Committee and deserve special mention. They are:

- Presence of food or beverages including drinking water where radioactive materials are used or stored, per the Radiation Safety Manual, page 3-5.
- Consumption of food or beverages in locations where radioactive materials are used or stored, per the Radiation Safety Manual, page 3-5.
- Missing bioassay measurements as required in the Radiation Safety Manual, pages 4-6 through 4-10.
- Inadequate security of radioactive materials, per the Radiation Safety Manual, page 3-5.
- Loss of reportable quantities of radioactive materials, per the Radiation Safety Manual, page 3-7 and Appendix C.

When encountering these violations, the RSO will invoke, as necessary, his/her authority to impose an immediate suspension of the use of radioactive materials until the violation is remedied. The RSO will report special violations to the Committee Chair immediately and the full Committee at the next regular meeting. The Committee Chair may take further disciplinary actions, as appropriate, pending review by the Committee.

Enforcement Action Flow Chart



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