

September 25, 2001

NRLSD Bulletin 2001 - 02

Notification and Reporting of Incidents

A. ADDRESSEES

All holders of a radioactive material license.

B. PURPOSE

This bulletin is being re-issued to remind licensees of the regulatory requirement to notify PNRI and to report radiological incidents occurring in their facilities that may affect or threaten the safety of the facility, the workers, and the public. Timely reporting PNRI of radiological incidents is necessary to ensure immediate assessment of licensee action to protect against radiation hazards and when necessary, to allow the PNRI to respond and provide the appropriate technical support or assistance. NRLSD Bulletin 94-03 was issued in 1994 to address the same regulatory requirements under a different accident scenario.

C. DESCRIPTION OF CIRCUMSTANCES

In recent years, a number of licensees have not complied with the notification requirements specified in the regulations particularly in the event of an accident that involves radioactive materials. At times, PNRI would receive information about a radiological incident or accident through the grapevines or PNRI was informed only after the notification and reporting period have elapsed. As a result, this specific requirement is disregarded, hence unnecessary injuries or damage to persons and facilities may have occurred without the necessary protective actions and subsequent corrective actions or remedies. This constitutes a violation of the regulations and may be a basis for imposition of regulatory sanctions.

D. DISCUSSION

Part 3 of the Code of PNRI Regulations provides that each licensee shall notify the PNRI within 24 hours by telephone or by any similarly fast means of communication, of any incident involving a licensed facility or radioactive material possessed by him, which may have caused or threatens to cause unnecessary risk to the health and safety of the public. Such notification requirement is further emphasized in the specific conditions of the license. Any occurrence of loss or theft of radioactive material, accidents in the course of transporting radioactive material, or damage or repair of device that contains radioactive material, must be notified to PNRI in accordance with this requirement. Other occurrences wherein notification and reporting is required are incidents which may have caused or threatens to cause:

1. Exposure of the whole body of any individual to more than 0.05 (5 rems) of radiation.
2. The release of radioactive material, so that had an individual been present in an area for 24 hours, the individual could have received an intake in excess of one ALI.
3. Levels of radiation or concentrations of radioactive material (whether or not involving exposure of any individual) in an unrestricted area in excess of ten times of any applicable limit for individual members of the public.
4. Potential hazard to persons in unrestricted areas due to loss or theft of radioactive material.
5. Substantial damage to property.

Licensees should be able to **quickly assess** the significance of an event and promptly notify the PNRI within the time limit. If the event cannot be clearly assessed to be reportable under this requirement, the licensee, through his RHSO, should act **conservatively** and do the required notification. Attached is **NRLSD Form 1** which will guide the licensee on the information that should be transmitted to PNRI. This action and the corresponding response by PNRI could prelude the deterioration of the incident into a more dangerous situation. The **NRLSD Form 1** should be duly accomplished. After notifying PNRI, a copy may be **faxed** to PNRI for validation purposes.

In addition, **CPR Part 3** requires that the licensee shall within 30 days of the occurrences make a report in writing to the PNRI concerning the incident. The report shall describe the incident in detail including the following : the licensed material involved; the extent of exposure of persons to radiation or to radioactive material (measured or calculated); levels of radiation involved; the circumstances under which the exposure, levels, concentrations, loss or theft occurred; and corrective steps taken and/or planned to prevent a recurrence. Attached is **NRLSD Form 2** which will guide the licensee in preparing the subsequent report to PNRI. This will serve as permanent record. Guide on how to fill up the forms is given in **Appendix 1**.

This requirement for the licensee to notify and report the occurrence of an incident should not be interpreted as reporting an apparent violation but rather to strengthen the commitment of the licensee to implement radiation safety measures in accordance with the regulations and the conditions of the license.

However, failure on the part of the licensee to comply with the notification and reporting requirements when a condition warrant such as action, may constitute a violation. PNRI will then inform the licensee of the violation and would require the licensee to explain why an administrative sanction should not be imposed.

E. REQUIRED LICENSEE ACTION

Licensees are required to comply with the regulatory requirements described in this bulletin. Licensee produces to comply with the notification and reporting requirements should be regularly reviewed and disseminated to ensure personnel awareness and its effective implementation.

PNRI expects the **RHSO** of the licensee to be the responsible for determining the severity of the incident and to initiate the corresponding reporting action. Despite the fact that the licensee is ultimately responsible for the safety of its licensed activities, PNRI will make available upon request the needed technical expertise and resources to assist licensees in mitigating or controlling the incident. Prompt reporting according to the regulations of the Institute makes compliance to safety requirements easier. For further inquiries, please contact :

Mr. OSROXZON L. AMPARO

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Nuclear Regulations, Licensing and Safeguards Division

Tel. No. : 929-60-11 local 227; 926-87-96

Fax No. : 920-16-46

NRLSD FORM 1 : INCIDENT REPORT (Early Notification)

1. Name and Address of Licensee:	2. Name and Position of Person Reporting the Incident:
3. Date and Time of Incident :	4. Exact Location of Incident :
5. Persons Present During the Incident/Readings of Individual Pen Dosimeter : (if available)	6. Type of Radiation Monitoring Instrument(s) Used During the Incident and their Readings :
	7. Quantity / Concentration of Radioactive Material Involved:
8. Describe of the Incident:	
9. Actions Taken :	

NRLSD FORM 2 : INCIDENT REPORT (30-day Reporting)

1. Name and Address of Licensee:	2. Date and Time of Incident :
3. Exact Location of Incident :	4. Persons Present During the Incident :
5. Persons Who were Overexposed at the Time of the Incident/Reading of Individual Pen Dosimeter: (if available)	6. Type of Radiation Monitoring Instrument(s) Used During the Incident:
7. Radiation Measurements :	8. Quantity / Concentration of Radioactive Material Involved:
9. Details of the Incident. Please include illustrations/ diagrams/drawings: (Use additional sheets, if necessary.)	
10. Corrective Actions Taken and/or Planned: (Use additional sheets, if necessary)	

APPENDIX 1-A

GUIDE IN ACCOMPLISHING NRLSD FORM1

1. Specify name of the institution, firm, hospital or person licensed by PNRI to handle radioactive material and address where radioactive material is located.
2. Indicate the name of the individual who is making this report and his position title in the organization.
3. Indicate the date and time when the incident occurred.
4. Indicate the place (building, room, section, area) where the incident occurred.
5. Name the persons present in the area when the incident occurred, to include all those who could probably be exposed to radiation due to the incident. Indicate the individual's ID, TIN, SSS No. and readings of individual pen dosimeters, if available.
6. Identify the radiation monitoring device(s) used to monitor radiation levels and the readings indicated in the device(s). Include manufacturer, model number, and serial number.
7. Describe the radioactive material involved in the incident specifying the type, number of sources, form and activity.
8. Describe the incident by narrating the events that actually occurred and the activities being undertaken when the incident occurred. Calculate individual doses based on re-enactment of the incident.
9. Identify actions taken to control the situation, including provisions made, instructions given, and persons informed regarding the incident.
10. Transmit the information of PNRI by telephone, telefax or by any similarly fast means of communication and look for :

The Chief
Nuclear Regulations, Licensing and
Safeguards Division

Telephone No. : 929-60-11 local 213 and 244
Tel. No. : (DL) : 920-8796
Fax No. : 920-1646 or 920-8796

APPENDIX 1-B

GUIDE IN ACCOMPLISHING NRLSD FORM 2

1. Specify name of the institution, firm, hospital or person licensed by PNRI to handle radioactive material and address where radioactive material is located.
2. Indicate the date and time when the incident occurred.
3. Indicate the place (building, room, section, area) where the incident occurred.
4. Name the persons present in the area when the incident occurred, to include all those who could have probably been exposed to radiation due to the incident. Indicate the readings of individual pen dosimeters, if available.
5. List the names of persons who were overexposed at the time of the incident.
6. Identify the radiation monitoring device(s) used to monitor radiation levels, and the readings indicated in the device(s). Include manufacturer, model number and serial number of device.
7. List down the different measurements conducted relative to the incident, to include those of personnel (staff, patient), equipment, and area (ventilation, surface contamination).
8. Describe the radioactive material involved in the incident specifying the type, number of sources, form and activity.
9. Give the details of the incident, specifying the sequence of events. Explain the cause or probable causes of the incident. Diagrams or drawings to clarify the incident would be useful. Conduct a re-enactment of the incident and calculate individual doses.
10. Identify radiation safety measures/actions taken to mitigate any possible adverse effect. Include procedures/programs implemented and/or planned to prevent the recurrence of the incident.