

**PHILIPPINE NUCLEAR RESEARCH INSTITUTE**  
**REGULATORY BULLETIN**  
**NUCLEAR REGULATIONS, LICENSING**  
**AND SAFEGUARDS DIVISION**

**BULLETIN No. 04 – 01**

**February 4, 2004**

**APPOINTMENT OF RADIOLOGICAL HEALTH AND  
SAFETY OFFICERS (RHSO)**

**A. ADDRESSEES**

All radioactive materials licensees

**B. PURPOSE**

This bulletin is to inform licensees that the designation/appointment of a Radiological Health and Safety Officer (RHSO) should be with the individual's knowledge and consent. Since the RHSO ensures that radiation safety activities are undertaken in compliance with regulatory requirements and in accordance with licensee-approved procedures, the designated RHSO must be fully aware of the duties and responsibilities of an RHSO as described in the regulations. Licensees are expected to review the significance of the information in this bulletin to ensure that regulatory requirements are adequately complied with and to consider appropriate actions applicable to their facilities.

**C. DESCRIPTION OF CIRCUMSTANCE**

The quality of performance by the RHSO in any licensed practice demonstrates the degree of compliance with the regulations and the conditions of the license. Several incidents reported to PNRI by licensees and by PNRI regulatory inspectors regarding non-conformances and/or violations of regulatory requirements and license conditions show the apparent failure of the RHSO to effectively undertake his/her duties and responsibilities as such. Regulatory assessments following reported incidents indicate that these incidents happened when the RHSO was not available and/or had resigned. In certain cases, the RHSO did not seem to have fulfilled his/her oversight functions with respect to licensed activities such that the safety and security of stored sealed sources were compromised. A causal analysis of such cases seems to indicate that the RHSO lacks the practical training or knowledge to adequately address the safe management of such incidents. These indications show that, from the point of view of radiation safety the RHSO has not fully demonstrated his/her commitment to the position as RHSO. Regulatory reviews and assessments of these alleged deficiencies demonstrate the following possible causes; (a) the RHSO may not be fully aware of the responsibilities associated with the position, (b) the licensee has not delegated to the RHSO the authority

and management prerogatives pursuant to the relevant provisions of the CPR, and (c) the licensee and the RHSO willfully violated the regulations and the license conditions.

#### **D. DISCUSSIONS**

A prerequisite for the issuance of any PNRI license is for the applicant/licensee to appoint a qualified RHSO who shall be responsible for implementing the radiation safety program.

Under the regulatory provision in the CPR – “Statement of Authority and Responsibilities”, it provides that –

- “(a) The licensee shall provide the RHSO sufficient authority, organizational freedom, and management prerogative, to:
  - (1) Identify, radiation safety problems;
  - (2) Initiate, recommend, or provide corrective actions; and
  - (3) Verify implementation of corrective actions.
- (b) The licensee shall establish and state in writing the authorities, duties and responsibilities of the RHSO and maintain the most recent edition of these statements until PNRI terminates the license.”

These regulatory provisions clearly demonstrate the important role of the RHSO in ensuring that radiation protection and safety measures are implemented correctly in the conduct of licensed activities in accordance with regulatory requirements and the conditions of the license. These specific regulatory requirements clearly indicate that the position and role of the RHSO should be given to a person who acknowledges the importance of the assigned tasks and accepts the responsibility and accountability attached to the position.

A written acceptance of the RHSO designation by the designated RHSO strengthens the licensee’s commitment to nuclear safety. It further delineates the RHSO’s accountability to PNRI with respect to compliance with the regulations, and the RHSO’s responsibility to the licensee relative to the specific authority and management prerogative given by the licensee.

It is expected that with this additional clarification of existing regulatory provisions regarding the designation of the RHSO, the effective implementation of the conditions of the license and adequate compliance with the regulations are further enhanced. Moreover, the safety and security of radioactive materials and the safe conduct of licensed activities in accordance with the established radiation protection program will also be strengthened.

#### **E. REQUIRED LICENSEE ACTION**

Licensees are required to review their administrative policy on the position of the RHSO with respect to the regulatory provisions describing the duties and responsibilities of the RHSO.

In order to ensure adequate compliance with the regulatory requirements elaborated in this Bulletin, each Licensee must submit to PNRI, within thirty (30) days from receipt of this Bulletin, the following:

1. A copy of the document that designates/appoints the individual who will be the Radiological Health and Safety Officer (RHSO) in the license. The document must bear the signature of the Licensee or an representative of management. The submitted documents must show proof that the designated RHSO has accepted and consented his designation in writing.
2. A copy of the **actual statement of authority and responsibilities** of the RHSO in accordance with the provisions of the regulations.

If you have any question about this bulletin, please contact the person listed below:

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