



PNRI REGULATORY BULLETIN No. 18-03

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**DESIGNATION OF RADIATION SAFETY OFFICERS (RSO) AND
ASSISTANT RADIATION SAFETY OFFICERS (ARSO)**

A. ADDRESSEES

All holders of PNRI radioactive materials license

B. PURPOSE

This bulletin is to inform licensees the designation of Radiation Safety Officer(s) (RSO), formerly known as, Radiological Health and Safety Officer (RHSO) and Assistant Radiation Safety Officer(s) (ARSO) should be with individual's knowledge and written consent. Since the RSO and ARSO ensure that radiation safety activities are undertaken in compliance with regulatory requirements and in accordance with licensee-approved procedures, both the designated RSO and ARSO must be fully aware of the duties and responsibilities as described in the regulations. All 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 CIRCUMSTANCES

The quality of performance by the RSO and ARSO in any licensed practice demonstrates the degree of compliance with the Code of PNRI Regulations (CPR) 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 RSO to effectively undertake his/her duties and responsibilities as such. Likewise, the ARSO acts as the RSO in his/her absence. Regulatory assessments following reported incidents indicate that these incidents happened when the RSO was not available and/or had resigned with no one to immediately takes over his/her duties and responsibilities. In certain cases, the RSO seemed to have neglected 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 indicates that the RSO lacks the practical training or knowledge to adequately address the safe management of such incidents. From the point of view of radiation safety, the observations show the RSO's lack of commitment. These

deficiencies found from the regulatory reviews and assessments are believed to be due to the following: (a) Without an ARSO, there is no one equally qualified to assume the duties and responsibilities of an RSO, (b) the RSO and the ARSO may not be fully aware of their responsibilities associated with the position and commitment without the written consent, (c) the licensee has not delegated to the RSO and ARSO the authority and management prerogatives pursuant to the relevant provisions of the CPR, and (d) the licensee and the RSO/ARSO willfully violated the regulations and the license conditions.

D. DISCUSSIONS

A prerequisite for the issuance of any PNRI radioactive material license is for the applicant/licensee to designate RSO and ARSO, equally qualified and competent to implement the radiation safety program. Under the regulatory provision in the CPRs – “Statement of Authority and Responsibilities”, it provides that –

- (a) The licensee shall provide the RSO and ARSO 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 RSO and maintain the most recent edition of these statements until PNRI terminates the license.

These regulatory provisions clearly demonstrate the important role of the RSO and ARSO 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 RSO and ARSO 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 consent and acceptance of the duties and responsibilities by the designated RSO and ARSO strengthens the licensee’s commitment to the safety of facilities and activities. It further delineates the RSO’s accountability to PNRI with respect to compliance with the regulations, and the RSO’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 RSO and ARSO, 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 RSO and ARSO with respect to the regulatory provisions describing the duties and responsibilities of the RSO. In order to ensure adequate compliance with the regulatory requirements elaborated in this Bulletin, please acknowledge receipt of this bulletin by mail or fax to the contact person.

CONTACT PERSON:

If you have any questions about this Bulletin, please contact the person listed below:

TEOFILO V. LEONIN, Jr.
Chief, Nuclear Regulatory Division

or

ALAN M. BORRAS
Head, Regulations and Standards Development Section/NRD

APPROVED:



CARLO A. ARCILLA, Ph. D.
Director

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