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June 2, 2010

## Radiation Safety Advisory 10-02

TO: Industrial Radioactive Materials Radiography Licensees

SUBJECT: Industrial Radiography Trainers, RSOs, and Radiographer Assistants

The purpose of this advisory is to provide guidance on implementing the new radiography regulations. The Radiologic Health Branch (RHB) will begin enforcing the regulations for Industrial Radiography Trainers, Radiation Safety Officers (RSOs), and Radiographer Assistants on December 31, 2010. The revised regulations for Trainers, RSOs, and Radiographer Assistants may be viewed by going to the California Department of Public Health's website, <http://ww2.cdph.ca.gov/rhb>, and searching for **R-25-03**.

As stated in Title 17, Code of California Regulations, Section 30333.05, Trainers shall submit a completed Industrial Radiographer Trainer Application to the Department for review. The RSO should submit an amendment request to add an individual to the license as a Trainer. The Trainer must meet the requirements in the new regulations. Please note that the individual cannot perform any training after December 31, 2010, unless he/she is listed on the radioactive materials license.

Similarly, as stated in 17 Title, Code of California Regulations, Section 30333.07, RSOs shall submit the attached application for the Industrial Radiography RSO for review. Please note that the individual cannot perform the duties of the RSO after December 31, 2010 unless he/she meets the new requirements and is listed on the license.

Note: Trainers and RSOs shall be a certified Industrial Radiographer and meet the requirements of Title 17, California Code of Regulations, Sections 30333.05 and 30333.07, respectively. The Provisional Industrial Radiographer ID Cards issued by Radiologic Health Branch is not a certification. An individual may be certified as an Industrial Radiographer by passing a test through ASNT or another Agreement State such as Texas.

**Finally, Radiographer Assistants shall have in their possession an ID Card issued by the licensee per Title 17, California Code of Regulations, Section 30333(b).**

You may send your questions or comments concerning Industrial Radiography (Provisional, RSO, or Trainers) to [radinquires@cdph.ca.gov](mailto:radinquires@cdph.ca.gov).

Sincerely,

Lauren B. Labbé, Chief  
Industrial and GLD Licensing Unit  
Radiologic Health Branch

Enclosures: Application for Industrial Radiography Trainer  
Application for Industrial Radiography RSO  
RSO Duties and Responsibilities and Delegation of Authority

**Application for Radioactive Materials**  
**Industrial Radiographer Trainer**

**Radioactive Materials Radiographer Trainer Requirements**

**Confirm and provide documentation that the radioactive materials radiographer trainer(s) has met the following requirements:**

- Is certified pursuant to Title 17, Section 30335.2 or is in compliance with Title 17, Section 30335.3,
- Has complied with the requirements of Title 17, Section 30333(a)(1) and (2) and
- Has at least 2,000 hours of experience as a radiographer using sealed sources, performing radiographic operations, radiation surveys and radiation safety related activities.

*\*NOTE\*: The experience may not include film development and interpretation, darkroom activities, travel, safety meetings, classroom training and any work activity not related to the performance of industrial radiography.*

Licensee's Name: \_\_\_\_\_ Radioactive Materials License #: \_\_\_\_\_

Trainer's Name: \_\_\_\_\_ Dates of experience per 30333.05 (a)(1)(B) & (C) \_\_\_\_\_  
Beginning (MM/DD/YY) – End (MM/DD/YY)

Radiographer's Certificate #: \_\_\_\_\_

**Or** a copy of both sides of the certification identification card issued by one of the listed entities in Title 17, Section 30335.3 (b).

Exposure Device Used: \_\_\_\_\_ Model: \_\_\_\_\_  
Manufacture's Name: \_\_\_\_\_

Trainer's Name: \_\_\_\_\_ Dates of experience per 30333.05 (a)(1)(B) & (C) \_\_\_\_\_  
Beginning (MM/DD/YY) – End (MM/DD/YY)

Radiographer's \_\_\_\_\_

Certificate #: \_\_\_\_\_

**Or** a copy of both sides of the certification identification card issued by one of the listed entities in Title 17, Section 30335.3 (b).

Exposure

Device Used: \_\_\_\_\_ Model: \_\_\_\_\_

Manufacture's Name: \_\_\_\_\_

Trainer's Name: \_\_\_\_\_ Dates of experience per 30333.05 (a)(1)(B) & (C) \_\_\_\_\_

Beginning (MM/DD/YY) – End (MM/DD/YY)

Radiographer's Certificate #: \_\_\_\_\_

**Or** a copy of both sides of the certification identification card issued by one of the listed entities in Title 17, Section 30335.3 (b).

Exposure

Device Used: \_\_\_\_\_ Model: \_\_\_\_\_

Manufacture's Name: \_\_\_\_\_

Trainer's Name: \_\_\_\_\_ Dates of experience per 30333.05 (a)(1)(B) & (C) \_\_\_\_\_

Beginning(MM/DD/YY) - End(MM/DD/YY)

Radiographer's Certificate #: \_\_\_\_\_

**Or** a copy of both sides of the certification identification card issued by one of the listed entities in Title 17, sec. 30335.3 (b).

Exposure

Device Used: \_\_\_\_\_ Model: \_\_\_\_\_

Manufacture's Name: \_\_\_\_\_

Trainer's Name: \_\_\_\_\_ Dates of experience per 30333.05 (a)(1)(B) & (C) \_\_\_\_\_

Beginning(MM/DD/YY) - End(MM/DD/YY)

Radiographer's  
Certificate #: \_\_\_\_\_

Or a copy of both sides of the certification identification card issued by one of the listed entities in Title 17, sec. 30335.3 (b).

Exposure

Device Used: \_\_\_\_\_ Model: \_\_\_\_\_

Manufacture's  
Name: \_\_\_\_\_

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Trainer's  
Name: \_\_\_\_\_

Dates of experience  
per 30333.05 (a)(1)(B)  
& (C) \_\_\_\_\_

Beginning(MM/DD/YY) - End(MM/DD/YY)

Radiographer's  
Certificate #: \_\_\_\_\_

Or a copy of both sides of the certification identification card issued by one of the listed entities in Title 17, sec. 30335.3 (b).

Exposure

Device Used: \_\_\_\_\_ Model: \_\_\_\_\_

Manufacture's  
Name: \_\_\_\_\_

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Trainer's  
Name: \_\_\_\_\_

Dates of experience  
per 30333.05 (a)(1)(B)  
& (C) \_\_\_\_\_

Beginning(MM/DD/YY) - End(MM/DD/YY)

Radiographer's  
Certificate #: \_\_\_\_\_

Or a copy of both sides of the certification identification card issued by one of the listed entities in Title 17, sec. 30335.3 (b).

Exposure

Device Used: \_\_\_\_\_ Model: \_\_\_\_\_

Manufacture's  
Name: \_\_\_\_\_

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Trainer's  
Name: \_\_\_\_\_

Dates of experience  
per 30333.05 (a)(1)(B)  
& (C) \_\_\_\_\_

Beginning(MM/DD/YY) - End(MM/DD/YY)

Radiographer's  
Certificate #:

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Or a copy of both sides of the certification identification card issued by one of the listed entities in Title 17, sec. 30335.3 (b).

Exposure

Device Used:

Model:

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Manufacture's

Name:

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**Radioactive Materials Radiation Safety Officer Requirements**

*For an individual to be a Radiation Safety Officer for a radioactive materials license, indicate and provide documentation that the individual has met the following:*

- Meets the requirements of Section 30333.05(a)(1) (*\*A provisional radiographer certificate is not acceptable.\**)
- Has 2,000 hours of experience as specified in Title 17, Section 30333.05(a)(1)(C)
  - No more than 900 hours of experience as a radiographer using radiation machines may be counted toward meeting the 2,000 hours.
- Has completed 4,000 hours of experience using radioactive materials and experience in radiation protection activities; such as developing or implementing procedures relating to the protection of workers and the public from radiation including the development or implementation of procedures for radiation surveys, leak testing of radioactive sources, assessment of dosimetry for radiation work, determination of necessary radiation shielding, review of survey, leak testing, and personnel dose measurements, training of personnel, use and maintenance of sealed sources and devices, monitoring of radiation emergency events, sealed source and device security, disposal of radioactive material, audits of radiographic operations, survey meter maintenance and calibration, and transportation of radioactive material.

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Print Name of Applicant

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Signature of Applicant

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Date

***NOTE: To amend a radioactive materials license, please provide a signed letter from upper management requesting an amendment to the license, provide the above information, and provide the RSO duties and responsibilities and delegation of authority letter. Send information in duplicate to the address below.***

## **Duties and Responsibilities of the Radiation Safety Officer and Delegation of Authority for Industrial Radiography**

### **RSO Duties and Responsibilities (Title 17, NUREG 1556, Vol. 2)**

The RSO's duties and responsibilities include ensuring radiological safety and compliance with California and Federal NRC regulations and the conditions of the license. These duties and responsibilities include, but are not limited to, the following:

- Activities involving licensed material that the RSO considers unsafe are stopped
- Radiation exposures to personnel are ALARA
- Follows all applicable parts of 10 CFR Part 20 and dose investigational levels
- Up-to-date radiation protection procedures in the daily operation of the licensee's radioactive material program are developed, distributed, and implemented
- Possession, use, and storage of licensed material is consistent with the limitations in the license, the regulations, the SSDR Certificate(s), and the manufacturer's recommendations and instructions
- Individuals installing, relocating, maintaining, or repairing devices containing sealed sources are trained and authorized by an NRC or Agreement State license
- Personnel training is conducted and is commensurate with the individual's duties regarding licensed radioactive material (initial and annual refresher training)
- Ensure survey meter calibration and maintenance
- Perform three month audits of each radiographer and radiographer assistant
- Documentation is maintained to demonstrate that individuals are not likely to receive, in one year, a radiation dose in excess of 10% of the allowable limits or that personnel monitoring devices are provided
- When necessary, personnel monitoring devices are used and exchanged at the proper intervals, and records of the results of such monitoring are maintained. The results given to the employee at least annually.

- Licensed material is properly secured (increased controls).
- Proper authorities are notified of incidents such as loss or theft of licensed material, damage to or malfunction of sealed sources, or fire (emergency phone numbers are kept current)
- Audits of the radiation safety program are performed at least annually and documented
- Quarterly inventory of sealed sources
- Proper use and maintenance of approved sources and devices
- If violations of regulations, license conditions or program weaknesses are identified, effective corrective actions are developed, implemented, and documented
- Licensed material is transported in accordance with all applicable DOT requirements
- Licensed material is disposed properly
- Inspection and maintenance of radiography exposure devices
- Appropriate records are maintained
- Up-to-date license is maintained, amendment and renewal requests are submitted to RHB in a timely manner
- Provide periodic on-site direct supervision over the implementation of the Radiation Safety Program in technical and administrative issues
- Dose records are reviewed quarterly to ensure safe operations, adequate staff training and engineering controls

**Note: In the event of a proposed change in the facility's RSO or license termination, you are aware of and agree to remain the licensee's RSO until RHB amends this license to reflect this request.**

**I (RSO) have reviewed the above Duties and Responsibilities and commit to comply with them.**

**Signed** \_\_\_\_\_ **Date** \_\_\_\_\_

**Print Name** \_\_\_\_\_

## Delegation of Authority

Memo To: Radiation Safety Officer  
From: Chief Executive Officer  
Subject: Delegation of Authority

You, \_\_\_\_\_, have been appointed Radiation Safety Officer and are responsible for ensuring the safe use of radiation. You are responsible for managing the radiation protection program; identifying radiation protection problems; initiating, recommending, or providing corrective actions; verifying implementation of corrective actions; stopping unsafe activities; and ensuring compliance with regulations. You are hereby delegated the authority necessary to meet those responsibilities, including prohibiting the use of radioactive material by employees who do not meet the necessary requirements and shutting down operations where justified by radiation safety. You are required to notify management of situations where staff are not cooperating and not addressing radiation safety issues. In addition, you are free to raise issues with the California Department of Public Health, Radiologic Health Branch at anytime. You will directly manage the radiation safety program and be physically present at this facility (and any other use locations listed in the Radioactive Materials License) whatever time as may be necessary to ensure that the radiation protection activities are performed.

\_\_\_\_\_/\_\_\_\_\_/\_\_\_\_\_  
Signature of Management Representative \* / Print or Type Name / Title

**I (RSO) accept the above responsibilities,**

\_\_\_\_\_ / \_\_\_\_\_

DATE: \_\_\_\_\_

Signature of Radiation Safety Officer / Print or Type Name  
cc: Affected department heads

\* Examples of Management representatives with signature authority are: Owner, Chief Executive Officer, Chief Operating Officer, President or Vice President of the organization.