

COMPLIANCE MONITORING PROGRAM FOR RADIATION USERS AT UCR

Compliance with the conditions of the UCR Radioactive Materials License is essential. To encourage compliance, the UCR Radiation Safety Committee (RSC) has established a grading system and progressive action plan that will monitor the level of compliance in a Principal Investigator's (PI's) lab and allow the RSC to take action according to the level of non-compliance found. For the grading system, a point value has been assigned to general categories of non-compliance according to the significance/risk to individuals and the campus (see Table II for general categories). A PI will accumulate points when items are found to be in non-compliance during the audits and contamination surveys conducted by EH&S Radiation Safety (see audit and reporting forms in Attachments I to IV) or when required tasks are not completed in a timely fashion (e.g., training not current, reports or personnel monitors not returned promptly).

A PI accumulates points for each item found to be in non-conformance and is given a "specified time" to achieve compliance (typically 30 days). If a non-conformance item is **repeated** within 12 months or if an item is **not corrected** within the "specified time", the number of points accumulated for the item will be **doubled** for each repeat occurrence or "specified time" period that passes (typically, points double every 30 days if the item is not corrected).

Points will be removed if deficiencies with a point value of 3 or less are corrected within 30 days.

The Radiation Safety Committee will take action as specified in Table I based on the number of points accumulated by a PI during the most recent 12 months (See Table III).

**Table I
LEVELS OF ACTION**

Level	Status	Actions
I	Accumulation of ≤ 10 points during 12 months*	a) Written notice to PI that identifies specific violation(s). Unless an earlier time for remediation is specified in the notice, the PI must correct deficiencies within 30 days. b) Correction of deficiencies will be confirmed during a follow-up audit by EH&S Radiation Safety.
II	Accumulation of >10 but ≤ 20 points during 12 months*	a) Written notice to PI, Department Chair and Chair of Radiation Safety Committee that identifies specific violations. b) Radioactive material will not be delivered to a lab that has accumulated more than 10 points until uncorrected deficiencies are resolved. c) Accompanying this notice is a warning that, the PI is nearing Level III points at which time the Radiation Use Authorization will be subject to suspension if these deficiencies are not corrected. d) Correction of deficiencies will be confirmed during a follow-up audit by EH&S Radiation Safety.
III	Accumulation of >20 points during 12 months	a) Written notice to the PI, Department Chair and Chair of the Radiation Safety Committee that the Radiation Use Authorization will be suspended** if the PI does not contact the Radiation Safety Officer to arrange rapid (within two weeks) correction of the specified deficiencies. b) If all deficiencies are not corrected within two weeks, the Radiation Use Authorization will be suspended**. Notice of suspension delivered to PI, Department Chair and Chair of the Radiation Safety Committee. c) The PI must correct deficiencies and submit a request to the Radiation Safety Committee for reinstatement of the Radiation Use Authorization. d) Correction of deficiencies will be confirmed by a follow-up audit by EH&S Radiation Safety***.

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- * Once corrected, points accumulated for a refresher training deficiency will be cleared (typically, refresher training every three years is not a representative indicator of ongoing compliance in the lab).
- ** Suspension of the radiation use authorization means that all work with radioactive materials in the lab will be stopped.
- *** Once all deficiencies are corrected, compliance points will be reset to 10.

Table II

GENERAL CRITERIA FOR ASSIGNING POINT VALUES FOR NON-CONFORMANCE

Type of Deficiency	Point Value
Administrative in nature/postings/copies/procedures	1
Records/labels/instrument calibrations/late stuff	2
Use records/location/receipt/transfer/very late or missing	3
Training/eating/drinking/unauthorized use or personnel	4
Contamination/sewer/trash	5 to 10 ^a

- a) At the discretion of the Radiation Safety Officer.

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Table III

RECORD OF ACCUMULATED NON-CONFORMANCE POINTS

PI: _____ RS #: _____ BUILDING: _____ ROOM(s): _____

#	Audit Date	Points	Points for 12 M	Comments
1				
2				
3				
4				
5				
6				
7				
8				
9				
10				
11				
12				
13				
14				
15				
16				
17				
18				
19				
20				