

# **UCLA Radiation Safety Committee**

## **Bylaws**

3/29/2012

### **Authority and Scope**

The Radiation Safety Committee (RSC) is the responsible authority for all uses of ionizing radiation at UCLA. The Broad Scope License requires the Committee to control the use of radioactive materials by issuing Radioactive Materials Permits to specific users who are held accountable for their projects and programs. The oversight authority over the use of radiation producing machines is assigned to the Committee by the Chancellor directly.

The Radiation Safety Program, under the management of the Radiation Safety Officer, conducts the day to day activities required to maintain safety and compliance and reports its activities to the RSC for review.

The Office of the Vice-Chancellor for Research appoints the members and chair of the RSC and works closely with the Vice-Chancellor of Administration in selecting the Radiation Safety Officer and in ensuring the effective operation of the Radiation Safety Program.

The Vice-Chancellors, the RSC, and the Radiation Safety Officer work collectively to provide a safe environment for faculty, staff, and patients.

The RSC is responsible for ensuring that mechanisms are in place for training programs, record keeping, registrations, approvals, licensure, policies, incident review and enforcement. The RSC controls the use of radioactive materials by issuing permits to individuals, referred to as the Principal Investigator, or in some clinical settings as an Authorized User, who are held accountable for the radiation related activities that fall under their authority. All research and non-research related machine-based radiation procedures are controlled through the issuance of permits or licenses as required by State law and monitored by the RSC. The RSC is responsible for enforcement of compliance as needed, with the support of the Vice Chancellor for Research.

The Radiation Safety Officer and staff conduct periodic inspections and evaluations of facilities to ensure compliance with regulations and to support an environment of safety. They are responsible for monitoring radiation exposure, reviewing inventories of radiation sources, machine registration, waste disposal, routine audits, and providing user training.

Collectively, the RSC, Radiation Safety Officer, and the Vice Chancellor for Research must work to ensure that safe uses of ionizing radiation, compliance with regulatory requirements, and that exposures are kept As Low As Reasonably Achievable (ALARA) in research, clinical, and industrial use and a safe environment is maintained for occupational workers, patients, faculty, staff, and members of the general public.

The Radiation Safety Officer and the Chair of the RSC are granted the authority to conduct routine unscheduled examinations of radiation use, to respond to emergency events, and to suspend any use of radiation that is deemed to be unsafe or that violates applicable regulations. Violations will be reported to the RSC in a timely manner in keeping with the Radiation Safety

Program's Three Strike Policy to facilitate the Committee's review of the issue. The Vice Chancellor for Research will be informed by the RSC Chair as needed as disciplinary or corrective action is taken.

### **Regulatory Requirements**

The use of radioactive materials at UCLA is permitted by the State of California Department of Public Health, Radiologic Health Branch through the issuance of a Broad Scope License to the Regents. This document, its associated amendments, and applicable regulatory state and federal regulations define the parameters under which radioactive materials can be used. Maintaining a broad scope license allows UCLA to make changes to the program under the direct oversight of the RSC without having to apply for license amendments with the State for each change in the program. In this sense, the RSC acts as the State's immediate oversight authority on campus. The use of machines that emit ionizing radiation is also regulated by the State of California through permitting, the licensing of users, and the inspection of registered facilities.

In order to maintain the broad-scope license, UCLA is required to establish a Radiation Safety Committee to establish specific local requirements and a Radiation Safety Officer who is qualified by training and experience to oversee day to day radiation safety operations and to provide surveillance over the usage of ionizing radiation for the Committee. To meet these requirements, the Chancellor of UCLA authorizes the establishment of a Radiation Safety Program to regulate the safe use of ionizing radiation from any source and for any purpose at UCLA and in associated locations that fall under the UCLA licensure jurisdiction. This authority is reinforced under Campus Policy 811 "Environmental Health and Safety" which references the combined oversight of radioactive materials and machines that produce ionizing radiation.

### **Committee Operation**

The primary business of the RSC will be conducted in formal meetings, which are to occur, at a minimum, on a quarterly basis. It is anticipated that the RSC may need to meet more frequently than this in order complete all of the business at hand. Some elements of the RSC's functions may be performed by permanent or temporary sub-committees appointed by the Vice Chancellor for Research, as needed. When a sub-committee is created, it will conform to any appropriate regulations in its membership, depending on its function. The sub-committees will report to the RSC at each meeting and permanent sub-committees will be represented by the Chair or designee as a voting member. The membership of permanent sub-committees as a whole shall be considered to be part of the RSC for regulatory purposes. The RSC will formally define the scope of and authorize the function of these sub-committees with consultation from the Vice Chancellor for Research.

For both RSC and sub-committee meetings, a simple majority of the membership plus the Radiation Safety Officer or their designee must be present to reach quorum and a simple majority of the members present will be needed to

formally pass initiatives. The Chair of the RSC can move to resolve initiatives by phone or email to provide for greater representation by the Committee or to allow for additional research and discussion.

The Radiation Safety Officer will present an annual report to the Committee that describes the status of radiation safety and compliance as required by regulation. The UCLA Radiation Safety Committee Bylaws will also be reviewed at the time of the annual report. Minutes of the RSC committee meetings will be kept, and meeting agendas generated by administrative support provided for as designated by the office of the Vice Chancellor for Research.

As the authority and function of the RSC spans a wide array of applications that may require a variety of specializations, the Committee may not cover all areas of the radiation safety program in each meeting and may have some members that only participate for subject areas that fall in their area of specialization. These meeting segments, if used, will be clearly defined in the agenda and minutes.

Special function areas that are likely to require specialized attention include the following:

- Purely Clinical Operations
- Purely Non-Clinical Research
- Review of Research Involving Human Subjects

In addition, Food and Drug Administration regulations require that a Radioactive Drug Research Committee meet a least quarterly and that it have an agenda and meeting minutes independent from the main RSC meeting. It is common for these Committees to conduct their meetings immediately before or after the main RSC, or medical research related sub-committee meetings.

### **Committee Membership**

The members and Chair of the RSC shall be appointed by the Vice Chancellor for Research and shall serve for three- and one-year terms, respectively. Members may serve additional terms as deemed appropriate by the Vice Chancellor for Research. The Chair of the RSC shall ensure that the membership of the RSC plus the associated sub-committees meets the regulatory and functional needs of the program. The Chair will also ensure that each sub-committee is actively represented on the main RSC and that the proceedings of the sub-committee meetings are made known to the RSC so that the Committee is able to provide oversight for all operations.

The RSC shall have, at a minimum, five members including the Radiation Safety Officer and a Vice Chancellor for Research representative. In the case where a specific member is not available for a committee meeting, a suitable designee can serve for the absent person. For the major sub-specialty operations, there are additional required and recommended members as follows:

#### ***Non-Clinical Operations***

- Required:
  - Sufficient expertise to cover all operational areas

- Recommended, representatives from:
  - Engineering
  - Physics
  - Bio-Medical Physics
  - Biological Sciences
  - Division of Laboratory Animal Medicine (DLAM)
  - Radiation Safety Officer

***Clinical Non-Research Operations***

- Required:
  - Nuclear Medicine Authorized User
  - Radiation Oncology Authorized User (qualified for HDR and Brachytherapy)
  - Radiation Safety Officer
  - Nursing Representative
  - Non Authorized User Management Representative
- Recommended:
  - Physician from Interventional Radiology
  - Radiology Medical Physicist
  - Radiation Oncology Medical Physicist
  - Nuclear Medicine Medical Physicist
  - Dental School Representative
  - Santa Monica Hospital Management Representative
  - Hospital Safety Representative

***Human Use Research and Radioactive Drug Research Committee***

- Required:
  - At Least 5 Members
  - Nuclear Medicine Physician
  - Radio Pharmacist
  - Expert in Radiation Safety and Dosimetry
  - Radiation Safety Officer
- Recommended:
  - Radiology
  - Radiation Oncology
  - Other Physicians and expert Researchers

In addition to the membership listed above, the Director of Environment Health and Safety will sit on the Committee and each Sub-Committee as a non-voting member. The membership of each committee and sub-committee will be carefully reviewed by the Vice Chancellor for Research to ensure that all functional elements of the program receive oversight. Members should be selected so as to produce an active and vital group of experts in the field who are dedicated to promoting a safe and productive environment. Additional members and consulting experts may be brought in on a permanent or temporary basis to cover the needs of the committees.