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Department of Science and Technology

PHILIPPINE NUCLEAR RESEARCH INSTITUTE



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PNRI REGULATORY BULLETIN No. 2021-01

ADMINISTRATIVE REQUIREMENTS ASSOCIATED WITH THE DESIGNATION OF RADIATION PROTECTION OFFICERS IN NUCLEAR MEDICINE FACILITIES

ADDRESSEES

All PNRI license holders for the medical use of unsealed radioactive material

PURPOSE

The Philippine Nuclear Research Institute (PNRI) issues this Regulatory Bulletin to remind licensees of the administrative practices associated with the designation of the Radiation Protection Officer (RPO) that are considered acceptable to the PNRI - Nuclear Regulatory Division (NRD). This Bulletin is intended primarily for the administrative and management personnel of the licensee who is responsible for establishing the qualifications and credentials of the RPO based on the unique requirements of its facilities, and the applicable regulations governing its radioactive material license.

ADMINISTRATIVE REQUIREMENTS

The Code of PNRI Regulations (CPR) Part 13, Licenses for Medical Use of Unsealed Radioactive Material, Rev. 02 which took effect on April 8, 2014, requires licensees to establish and implement a Radiation Protection and Safety Program that is commensurate with the scope and extent of authorized activities and sufficient to ensure compliance with the regulations and the conditions of the license. The licensee is required to designate an independent and qualified Radiation Protection Officer (RPO), who is responsible for implementing the Radiation Protection and Safety Program. The RPO shall be technically competent in radiation protection matters relevant to the type of practice; and shall have the appropriate qualification and training commensurate with the levels of risks associated with the licensed activities.

Furthermore, the licensee is responsible for establishing the duties and responsibilities of the RPO and in so doing, provide the RPO with sufficient authority, organizational freedom, time, resources, and management prerogative to carry out the tasks.

DISCUSSION

The Radiation Protection Officer (RPO) is a technically competent person, designated by the licensee and approved by the PNRI, to supervise the implementation of the Radiation Protection and Safety Program. In practice, licensees have designated Authorized Users, Medical Physicists, or Nuclear Medicine Technologists to serve as the RPO provided that the individual has met the minimum requirements set by the regulations. However, when designating an RPO, the applicant/licensee should keep in mind the duties and responsibilities of the position and select an individual who has sufficient time and resources to carry out the necessary tasks. While there is no specific requirement to have the RPO onsite on a day-to-day basis, the RPO could not normally be capable of performing the duties of the position as required by the regulations if he/she is not onsite at the time licensed activities are being performed.

Furthermore, competing duties or priorities should not be assigned to the RPO that might hinder significantly from their ability to manage the Radiation Protection and Safety Program. The functions of an RPO should not be considered as an adjunct to any other tasks; in fact, they should be considered an essential element for ensuring the protection of all persons impacted and the safe use of nuclear and radioactive materials. If the RPO role is in addition to the individual's other professional responsibilities (e.g., nuclear medicine physician, nuclear medical physicist, nuclear pharmacist, nuclear medicine technologist), the licensee should be able to provide proof of the appropriate balance of allotted time per week and institutional support. As best practice, the licensee should provide the RPO with a description of duties, as well as the number of hours the RPO should be dedicating to them, subject to the approval of the PNRI. The licensee must provide sufficient time to the RPO to properly plan, monitor, manage and conduct the activities required to ensure compliance with all regulatory requirements. When allocating time to these duties, the licensee should consider the number of workers, the magnitude of operations and the complexity of the licensed activities.

The ability of the RPO to fulfill the duties and responsibilities will be evaluated by the NRD, based not only on the minimum qualifications set by the regulation but also on meeting the allocated time to ensure that the activities are being performed in accordance with the approved procedures and regulatory requirements. If the NRD finds that the designated RPO is unable to fulfill the required time allocation as it relates to his duties and responsibilities, the NRD will notify the licensee in writing where additional time or other assistance is needed. The licensee will be given 60 days upon the issuance of the notice to make corrective actions and to ensure that proper institutional support is provided to comply with this requirement.

REQUIRED LICENSEE RESPONSE

Licensees are required to update their Radiation Protection and Safety Program detailing the duties and responsibilities of the RPO and the time allocation to perform them. The document should provide proof that the individual designated as the RPO has sufficient

time to perform his/her duties and responsibilities in accordance with the approved procedures and regulatory requirements. This should be submitted to the NRD as part of the licensees' Annual Periodic Review of their Radiation Protection and Safety Program pursuant to Section 14 (c) CPR Part 13.

CONTACT

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