

Title: Policy on Storing Radioactive Materials and Inactivated Radioactive Materials Permits

Policy Number: 1

Date: August 10, 2017

Purpose: To comply with decommissioning timeliness rules, training and experience frequency rules, and to reduce the risk and liability of long-term storage of radioactive material.

Regulatory Reference: 10 CFR 30(various)

Scope: All individuals issued a radioactive materials permit in accordance with University of Missouri type A medical broad scope license 24-00513-32.

Responsible Party: University of Missouri Radiation Safety Committee

Definitions:

- Principle Activities: Defined in 10 CFR 30.4 as activities authorized by the license which are essential to achieving the purpose(s) for which the license was issued or amended. Note: storage during which no licensed material is accessed for use or disposal and activities incidental to decontamination or decommissioning does not meet the definition of principal activities.
- Inactive User: Defined as a radioactive materials permit holder who has applied for inactive status.
- Inactive Status: Defined as a permit that no longer has the authority to receive, use, or store radioactive materials. All laboratory spaces are closed out and hazard signage removed.
- Active User: Defined as a radioactive materials permit holder who is currently using radioactive materials in research and/or clinical activities.

Policy

1. Policy Justification

- Long-term storage by a radioactive materials permit holder (i.e. storage, but non-use of radioactive materials for 24 months or longer) can have serious implications for compliance with the decommissioning timeliness rules when no active user remains in the building.
- In order to limit compliance liability long-term storage (i.e. storage, but non-use of radioactive materials for 24 months or longer) is not permitted.
- In order to comply with training frequency rules, inactive status of a radioactive materials permit 7 or more years from the initial inactive date is not permitted unless all required training and experience is maintained.

2. Policy Conformity

- Radioactive materials permit holders are required to notify EHS in writing (including via email) when they plan to place stock material in long term storage
- After 24 months, radioactive materials in storage must be disposed properly through EHS waste streams, transferred to another RAM permit holder, or used in experiments

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- Radioactive materials permit holders with no radioactive material in use or storage must apply for inactive status.
- Renewal as inactive will be allowed for seven (7) years past the initial inactivation date or date of most recent completion of all required training (including experience documentation), whichever is newer.
- Permits no longer eligible for inactive status will be terminated.
- Requests to reactivate while in inactive status only require administrative review, not review by the Radiation Safety Committee.
- Requests to reactivate terminated permits require a new application including Radiation Safety Committee approval.

Approved by the Radiation Safety Committee:

Thursday, August 10, 2017