

# How Should NRC Increase Attention to Safety Culture in the Materials Area

Comments from a Medical and  
University Licensee Perspective

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# University of Pittsburgh and Medical Center Radiation Protection Program

- Broad scope, gamma irradiator, gamma knife, accelerator, and cyclotron licenses
- Covers university campus and 5 medical center hospitals
- Over 600 research laboratories using RAM
- Medical uses covered under 35.100, 200, 300, 400, 500, 600, and 1000

# Is There a Need to Increase the Level of Safety Culture Among Licensees

- Importance for development and maintenance of a safety culture for use of radioactive material
- Is there data to support a need to increase the level of safety throughout materials users (incidents, regulatory violations)
- Is a proactive agenda where more is better justifiable from a cost/benefit perspective

# Considerations for Development of a Policy Statement on Safety Culture

- Safety culture for radiation sources is closely linked to chemical, biological, and patient safety practices within medical and university environment
- Important components for maintaining a culture of safety
  - Training and instruction on policies and procedures
  - Monitoring compliance through audits and surveillance
- Professional societies (SNM, AAPM, HPS, ACR, ASTRO) develop standards of practice which are adopted by licensees

# Considerations for Policy Statement on Safety Culture (cont.)

- The level of safety culture being promoted should be proportional to the risk (e.g., type, quantity, and use of material)
- Policy should express performance-based goals
- May be difficult for NRC to express a single policy that gives appropriate weight and balance for safety culture across the range of licensees

# Considerations for Development of a Policy Statement on Security Culture

- Security of sources in the medical and academic community presents unique challenges
- Current IC's focus on access controls while more effective security may be achieved through detection and response
- Security requirements should be prescriptive to eliminate varying interpretations
- There should be separate safety and security culture policy statements

# NRC Interactions with Licensees to Improve Attention to Maintaining Safety and Security Culture

- Continue electronic publication of NRC Information Notice, FSME Licensee Newsletter, and Regulatory Issue Summary
- Routine Inspections - Advocate NRC not cite licensee self-identified violations if appropriate corrective action has been taken
- Zero-tolerance enforcement policy has potential to negatively affect maintaining a culture of compliance

# NRC and Agreement State Uniformity

- Need for consistent safety and security policies
- Interpretation and enforcement of radiation protection regulations should be the same throughout the country