

RADIATION SAFETY OFFICE

April 10, 2020

To: Mr. James Trapp
Division of Nuclear Medicine Safety
Nuclear Regulatory Commission - Region I

SUBJECT: REQUESTING REGULATORY RELIEF DURING THE CORONAVIRUS DISEASE 2019

REFERENCE: U.S. NRC METHODS FOR PROVIDING REGULATORY RELIEF DURING THE CORONAVIRUS DISEASE 2019 PUBLIC HEALTH EMERGENCY

Dear Mr. Trapp,

The Howard University Radiation Safety Office (RSO) is licensed to perform clinical and research activities using radioactive materials. For regulatory compliance, this office conducts many daily, weekly, and quarterly surveys and activities for the Radiation Safety Program. However, due to the recent COVID-19 public health emergency (PHE), Howard University and University Hospital have mandated all non-essential employees to begin remote operations.

Therefore, the RSO may not be able to perform some of these radiation monitoring services, in order to meet regulatory requirements, as a physical presence is required in the office. The activities that might be affected during this COVID-19 pandemic, are the following:

1. Daily monitoring of the hospital loading dock radiation area monitors including radioactive wastes.
2. Weekly wipe tests for the RSO facilities/labs.
3. Weekly wipes tests in the hospital hot labs.
4. Quarterly inspection of the Howard University (HU) research labs (authorized to use licensed materials).
5. Semi-annual radiation survey of the HU research labs (not authorized to use or possess licensed materials).
6. Quarterly inspection of the Howard University Hospital clinical labs.
7. Timely distribution and monitoring of personnel monitoring dosimetry services to radiation workers at HUH and HU. We receive film badge dosimeters from Landauer, Inc. We provide dosimetry services to the radiation workers on a monthly and quarterly basis. Landauer, Inc. has agreed to extend the quarterly dosimeters to by annual cycles during this COVID 19 period.



At this time, the Radiation Safety Office is seeking regulatory relief from performing the above-mentioned activities during this Public Health Emergency. This request is in reference to the US NRC letter dated April 07, 2020, explaining the regulatory relief during the Corona Virus Disease 2019 (COVID-19) Public Health Emergency.

Thank you so much for your time and consideration on this matter. Please do not hesitate to contact me at my email satya.bose@howard.edu or phone (202) 373-4161 should you require any additional information.

Sincerely,



Satya R. Bose, Ph. D., DABR
Associate Professor, Radiation Oncology
Director of Radiation Safety
Radiation Safety Officer
Chief Radiation Oncology Physicist

Cc: Anthony K. Wutoh, Ph.D., R.Ph.
Provost and Chief Academic Officer
Howard University