

**Harvard University
Radiation Safety Committee:
Roles and Responsibilities**

Charter

March 2011

**Radiation Protection Office
Environmental Health Safety and
Emergency Management**

Purpose

This charter document defines the membership, authority, responsibilities and operating rules of the Radiation Safety Committee at Harvard University.

Policy

The Radiation Safety Committee (“Committee”), a Standing Committee at Harvard University (“University”), is the governing body for all aspects of radiation protection within the University, including all affiliated research, clinical, instructional and service units using ionizing and non-ionizing radiation sources or devices (collectively referred to as “radiation sources”) in facilities owned or controlled by the University. The Committee shall ensure that all possession, use and disposition of radiation sources by University personnel at Harvard University complies with pertinent federal and state regulations and with the specific conditions of licenses issued to the University, and that all concomitant radiation exposures are maintained As Low As Reasonably Achievable (ALARA).

Responsibilities and Authority

The Radiation Safety Committee is a University Standing Committee that is responsible for the oversight of the University Radiation Protection Program. In fulfillment of this role, the Committee promulgates policies, rules and procedures for the safe use of radiation sources. The Committee has the authority to grant, deny, require changes or withdraw permission for the use of radioactive materials or any other radiation devices or sources within the University to comply with regulation or meet reasonable standards for health and safety. It is the intent of the University that no use of radiation proceed without the knowledge and approval of the Committee.

The Committee reports to the University’s Executive Vice President. In its oversight role of the Radiation Protection Office (RPO), the Committee is responsible for the following:

- Establishing University policies related to radiation safety,
- Establishing training procedures and criteria,

- Reviewing and approving, modifying or denying all proposals for ionizing and nonionizing radiation use and setting conditions of use for permits proposed by the Radiation Protection Office,
- Voting to approve, disapprove, or amend proposals,
- Ensuring that only qualified individuals are permitted to use radiation sources, or to supervise such use by others,
- Conducting an annual audit of the Radiation Protection Program that includes a review of documentation and performance required to comply with license conditions, Nuclear Regulatory Commission and Commonwealth of Massachusetts regulations, and Radiation Safety Committee recommendations. This audit is reviewed and discussed at a Radiation Safety Committee meeting and is recorded in the minutes,
- Monitoring timely and effective resolution of corrective actions to assure the effectiveness of the radiation safety program,
- Enforcing compliance with the program, including imposition of sanctions for non-compliance,
- Voting to change service vendors as may be required by license, regulation, or commercial requirements,
- Maintaining a list of the members and their appropriate training and experience,
- Making recommendations to the University Executive Vice President of Administration on risk management issues related to radiation safety.

Membership

Membership of the Committee includes the Director of Environmental Health Safety and Emergency Management, the Radiation Safety Officer (RSO), faculty who are knowledgeable in the use of ionizing and non-ionizing radiation sources, and senior administrative officers of the University, including a designated management representative of the Executive Vice President, who is neither a user nor the RSO. Membership may also include Environmental and Safety Compliance Officers from the various University schools and/or departments where radiation is

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used.

The Committee size and composition shall represent the spectrum of radiation users across the University. The extent of representation shall be determined by the Executive Vice President, who shall encourage the Offices of the Dean to appoint knowledgeable users from the research and academic community.

The membership process consists of formal appointment to the Committee from a University Office of the Dean, or from the Executive Vice President. Members shall be appointed for a renewable term of two years. Nominations for membership may be made by existing Committee members to provide representation from major academic, clinical and research areas that use radiation sources. Qualified nominees shall include principal investigators and/or experienced professionals, proficient in the use and handling of ionizing and nonionizing radiation sources, who are knowledgeable in regulatory compliance and University policy related to radiation use. Representatives of other groups or functions closely associated with the radiation safety program, (e.g. purchasing, safety and maintenance) may also be nominated.

The Committee Chair

The Chair has the responsibility for conducting regular Committee meetings and implementing the control functions of the Committee. The Chair works closely with the RSO to ensure that the Radiation Protection Office implements the directives of the Committee. The Committee members elect the Chair from within the Committee membership for a renewable three-year term.

The Committee may choose to elect an alternate Chair, for a renewable three-year term, responsible for discharging the duties of the Chair, if the Chair is unavailable.

Attendance, Alternates, and Replacements

Regular attendance shall be required at Committee meetings. In the event that a member does not attend four consecutive meetings, at the discretion of the Chair, the Committee may vote to request that the appropriate Dean appoint a replacement member.

To plan for temporary absences, each Committee member may, with the consent of the Chair, appoint a designated alternate for a particular meeting. The designee may represent the absent Committee member in all aspects of Committee participation, and shall have the responsibility and authority to act on behalf of that member.

A Committee member may nominate a qualified replacement at any time during the appointed term for the remainder of that term. A formal letter from the Dean or the Executive Vice President to the Committee shall be required to document member appointment. In the event a member or designee leaves the University, membership is automatically terminated.

The Office of the Dean or the Executive Vice President shall document changes to membership in writing.

Meetings, Agenda and Quorum

The Committee meets at least once during each calendar quarter, or more frequently, at the discretion of the Chair. A quorum consists of more than fifty percent of its then current membership, and must include the Chair, the RSO, and the University Management representative. All members present are entitled to vote. Committee decisions are made by the majority vote of a quorum of committee members and members shall not vote on issues in which they have a personal involvement. Between meetings, interim decisions may be made by established subcommittees or by a mailed ballot, but such decisions shall not be considered final until ratified by vote at a called meeting of the Committee. Parliamentary procedures shall be determined by *Robert's Rules of Order*, as appropriate. At these meetings, the Committee conducts the following

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activities:

- Sets University radiation policy,
- Reviews records and reports from the RSO, results of regulator and outside inspections and audits, written procedures, incidents and laboratory audits performed by the RSO and Radiation Protection Office staff,
- Reviews and approves or disapproves Authorizations as proposed by the Radiation Protection Office. Authorizations shall be approved only if the user has fulfilled the training or competency requirements outlined in the University Radioactive Materials License and the Radiation Safety Manual,
- Reviews inventories, procurement, possession limits, and other actions with radioactive materials and radiation devices covered under the Authorizations,
- Reviews and approves training programs,
- Reviews organization and maintenance of records of the Committee's proceedings, including radiation safety evaluations,
- Reviews and approves manuals and procedures issued by the Radiation Protection Office and emergency response plans, including agreements, if any, with offsite emergency response agencies,
- Conducts reviews of laboratory performance and implements an enforcement program to ensure compliance with the requirements of the Radiation Protection Program,
- Makes changes in policies and procedures, as appropriate.

Reports, Records, and Minutes

The minutes of the Committee meetings, together with all reports submitted to the Committee, serve as the official documentation of the radiation protection program of the University. The minutes of each meeting shall include the date of the meeting, the members present and absent, a summary of deliberations and discussions, and recommended action items. Following each meeting, minutes shall be prepared in draft form and copies sent to all members for review and

comment. A majority vote at the next meeting shall be taken to approve the minutes.

A copy of the minutes of all Committee meetings, with all subcommittee reports and attachments, shall be submitted annually to the University Archives or retained with Radiation Protection Office files for permanent storage in accordance with University policy, where it shall be maintained until disposal is authorized by the regulations of the licensing body.

Subcommittees

The Committee may establish subcommittees to perform specific functions. Each subcommittee shall submit a written report of its activities and actions to the Committee for each calendar quarter in which it was active. Any authority granted to a subcommittee is subject to approval for action by the full Committee. As described above, each subcommittee report accepted by the Committee becomes part of the record filed in the University Archives or retained with the Radiation Protection Office files.