Radioactive Materials Covid-19 Guidance

Radioactive Materials Inspection

The Radiologic Health Branch (RHB) will continue to conduct radiation safety inspections. To limit the time inspectors are physically present at licensee facilities, the inspections may include remote components. All hospital licensees, and most other licensees, will be contacted by phone before inspections to ensure: the inspections won’t interfere with their COVID-19 or other emergency activities; availability of personnel; and protection of vulnerable licensee personnel.

The RHB recognizes that during the current COVID-19 Public Health Emergency (PHE), licensees may experience challenges in meeting certain regulatory requirements as well as personnel availability for inspections. The RHB encourages licensees to contact John Fassell identifying any potential inspection issues resulting from the COVID-19 PHE. An email with “COVID-19 Request” in the subject of the email, sent to john.fassell@cdph.ca.gov with cc to robert.greger@cdph.ca.gov is the preferred format for written requests.

Radioactive Materials Licensing

The RHB has multiple methods of providing relief from regulatory requirements while continuing to maintain safety and security. These methods fall broadly into different categories, which include exemptions from regulatory requirements, amendments to license conditions or technical specifications, and enforcement discretion.

The RHB has authority to provide exemptions from its regulations and amendments to license conditions and technical specifications when applicable criteria are met. Licensees that anticipate that they will be unable to comply with a regulatory requirement or license condition should contact the RHB as soon as a potential issue is identified. The RHB will consider these requests for relief on a case-by-case basis. If the requirements for an exemption or amendment are met, the RHB will provide written approval for a specified period of time. These requests should be sent via email to Ira Schneider at ira.schneider@cdph.ca.gov.
In cases where multiple licensees in a specific class are experiencing the same challenges in meeting a certain regulatory requirement, the RHB would consider developing a streamlined process for pre-identified relief requests that are consistent with maintaining safety and security provided there is sufficient technical/regulatory justification. It is critical for licensees to understand that compliance with the regulation or commitment from which relief is granted must be restored prior to the expiration of the exemption or amendment. Should additional time beyond the expiration of the exemption of amendment be needed to restore compliance due to the COVID-19 PHE condition, the RHB would consider an extension to the exemption or amendment based on a subsequent request that updates all the information in the initial request.

Radiographer Certification

The Nuclear Regulatory Commission (NRC) issued a temporary exemption to The American Society for Non-Destructive Testing (ASNT) on extending radiographer certifications up to September 30, 2020, in two 90-day extensions. ASNT plans to send the impacted individuals an email confirming their extension to June 30, 2020 (with a second extension to September 30 if necessary), and update their record in their website so any jurisdictional authority could confirm their certification is current through their Certificate Holders Directory at: Certificate Holders Directory.