

NRC LICENSE COMPLIANCE AND ENFORCEMENT POLICY

Compliance Requirement	Non-Compliance Item	Enforcement Action*
<p>1. Permit Holders are required to submit Quarterly Reports to the Radiation Protection Division (RPD) within 15 days of the end of each calendar quarter.</p>	<p>Failure to submit Quarterly Report.</p> <ul style="list-style-type: none"> • Late by > 15 days • Recurring failure to correct. 	<ul style="list-style-type: none"> • Hold on radioactive material orders. • Hold on radioactive material orders, and Permit Holder must submit a statement of corrective actions to the Permit Review Subcommittee (PRS) within 30 days. <p>PRS chair may require appearance at next subcommittee meeting.</p> <p>Possible permit close-out.</p>
<p>2. Permit Holders are required to submit renewal applications prior to the expiration of their current permit.</p>	<p>Failure to submit renewal application.</p> <ul style="list-style-type: none"> • Less than 30 days beyond expiration. • More than 30 days beyond expiration. 	<ul style="list-style-type: none"> • Hold on radioactive material orders. • Hold on radioactive material orders, and notice of permit close-out.
<p>3. Permit Holders are required to purchase, transfer and receive all radioactive material through the RPD purchasing program. This includes the receipt of radioactive materials from vendors, government agencies, other Permit Holders, or other institutions.</p>	<p>Unauthorized transfer to or from another Permit Holder within the University.</p> <ul style="list-style-type: none"> • 1st violation. • Recurring failure to correct. <p>Unauthorized purchase or receipt of radioactive materials, or unauthorized transfer to an individual or institution, outside of the University.</p>	<ul style="list-style-type: none"> • Hold on radioactive material orders, and Permit Holder must submit a statement of corrective actions to the RPD within 15 days. • Hold on radioactive material orders, and the Permit Holder must appear before the PRS within 30 days. <p>Possible permit close-out.</p> <p>Hold on radioactive material orders, and the Permit Holder must appear before the PRS within 30 days.</p> <p>Possible permit close-out.</p>
<p>4. Permit Holders are responsible for the secure storage and proper disposal of radioactive materials through the RPD's waste management program.</p>	<p>Improper disposal or loss of control of radioactive materials due to negligence.</p>	<p>Hold on radioactive material orders, and the Permit Holder must appear before the PRS within 30 days.</p> <p>Possible permit close-out.</p>

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5. Food, beverages, smoking, cosmetic application and mouth pipetting are prohibited in radioactive material laboratories.	Failure to prohibit. <ul style="list-style-type: none"> • 1st violation. • Recurring failure to correct. 	<ul style="list-style-type: none"> • Permit Holder must submit a statement of corrective actions to the RPD within 30 days, or a hold will be placed on radioactive material orders. • Hold on radioactive material orders, and Permit Holder must submit a statement of corrective actions to the PRS within 30 days. <p>PRS chair may require appearance at next subcommittee meeting.</p> <p>Possible permit close-out.</p>
6. Permit Holders are required to notify the RPD when they are to discontinue use of radioactive materials. ALSO, the RPD must be contacted before laboratories can be removed from permits (close-outs).	Abandonment of radioactive materials and laboratories and/or improper close-out procedures.	<p>Permit Holder and/or department will pay costs incurred from radioactive material removal and area decontamination.</p> <p>PRS chair may require appearance before subcommittee at next meeting.</p> <p>Possible permit close-out.</p>
7. Personnel are required to return all dosimeters to the RPD for processing.	Failure to return or loss of dosimeter. <ul style="list-style-type: none"> • 1st occurrence. • Recurring failure to correct. 	<ul style="list-style-type: none"> • Fee may be assessed against individual or department.** • Fee may be assessed and Permit Holder must submit a statement of corrective actions to the RPD within 15 days.** <p>PRS chair may require appearance before subcommittee at next meeting.</p> <p>Possible permit close-out.</p>
8. Personnel are required to respond to radiation dose investigations conducted by the RPD.	Failure to respond (submit report). <ul style="list-style-type: none"> • No response within 30 days. • Continued or repeat offense. 	<ul style="list-style-type: none"> • Individual and Permit Holder are notified of non-compliance and are required to submit report. • Hold on radioactive material orders and department is notified of non-compliance and is required to submit report. <p>PRS chair may require appearance before subcommittee at next meeting.</p> <p>Possible permit close-out.</p>

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9. Personnel are required to report for bioassay tests as deemed necessary by the RPD.	Failure to report for bioassay. <ul style="list-style-type: none"> • 1st occurrence. • Recurring failure to correct. 	<ul style="list-style-type: none"> • Individual restricted from labeling and a hold on radioactive materials orders. Permit Holder must submit a statement of corrective actions to the RPD within 30 days. • Hold on radioactive material orders, and Permit Holder must submit a statement of corrective actions to the PRS within 30 days. PRS chair may require appearance before subcommittee at next meeting. Possible permit close-out.
10. Other compliance requirements of the University's NRC Licenses and NRC Regulations as specified by the Radiation Protection Division (RPD) and/or the All University Radiation Protection Advisory Committee (AURPAC).	Failure to correct non-compliance items as required by the RPD. <ul style="list-style-type: none"> • Failure to report corrective action(s) within the allotted time. • Recurring failure to report. 	<ul style="list-style-type: none"> • Hold on radioactive material orders. • Hold on radioactive material orders. PRS chair may require appearance before subcommittee at next meeting. Possible permit close-out.

* If any item of non-compliance results in Nuclear Regulatory Commission or other regulatory agency fines, the Permit Holder, responsible persons and/or departments will be assessed the monetary penalties levied against the University's licenses and permits.

** The fee assessed by the RPD will equal the cost incurred for the replacement of indicated items.