COMPATIBILITY IN RADIATION SAFETY REGULATIONS

POSITION STATEMENT OF THE HEALTH PHYSICS SOCIETY*

The Health Physics Society believes the current regulatory framework for establishing and enforcing regulatory radiation safety standards results in inconsistent, inefficient, and unnecessarily expensive public health protection policies regarding radiation safety. Therefore, the Society advocates the establishment of a regulatory framework with the following requirements:

1. A single, independent U.S. federal agency (herein called the Agency) shall have the responsibility and authority to establish all ionizing radiation safety standards for all controllable sources\(^1\) of occupational and public exposures.

2. The Agency shall have the responsibility and authority to oversee enforcement of all radiation safety programs implementing these radiation safety standards.

3. Provisions shall be made for the Agency to delegate enforcement authority to other governmental entities or agencies similar to the current provisions for Agreement State Programs under the Atomic Energy Act of 1954 as amended.

4. Delegation of authority under the previous provision shall be for enforcement responsibilities only. The regulatory radiation safety standards for these lower-tiered programs would be those established by the Agency.

5. Radiation safety standards shall be consistent with the recommendations of the International Commission on Radiological Protection (ICRP), the National Council of Radiation Protection and Measurements (NCRP), and scientific consensus standards.

Adopted: January 1992
Revised: August 2000
Reaffirmed: July 2007

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A controllable source is any source of radiation exposure for which reasonable actions can be taken to limit radiation exposure without resulting in adverse effects on individuals. Examples of controllable sources include:

- Any source of man-made radiation exposure in the workplace (i.e., occupational exposure).
- Any facility or other operation that results in releases of man-made or technologically enhanced, naturally occurring radionuclides to the environment.
- Exposures from radiation-producing machines.
- Any localized areas of environmental contamination resulting from planned or accidental releases of radioactive material or disposal of radioactive waste.
- Technologically enhanced, naturally occurring radioactive material.
- Medical exposures to individuals who are not the subject of the medical procedure resulting in the exposure.
- Indoor radon.

Examples of sources that are not controllable include:

- Natural terrestrial background radiation.
- Cosmic radiation.
- Naturally occurring radioactive material present inside the body.
- Medical exposures to individuals who are the subject of the medical procedure resulting in the exposure.
- Global fallout of radionuclides from atmospheric testing of nuclear weapons.
- Regional or global radioactive contamination from accidental releases of radioactive material.

*The Health Physics Society is a nonprofit scientific professional organization whose mission is excellence in the science and practice of radiation safety. Since its formation in 1956, the Society has represented the largest radiation safety society in the world, with a membership that includes scientists, safety professionals, physicists, engineers, attorneys, and other professionals from academia, industry, medical institutions, state and federal government, the national laboratories, the military, and other organizations. Society activities include encouraging research in radiation science, developing standards, and disseminating radiation safety information. Society members are involved in understanding, evaluating, and controlling the potential risks from radiation relative to the benefits. Official position statements are prepared and adopted in accordance with standard policies and procedures of the Society. The Society may be contacted at 1313 Dolley Madison Blvd., Suite 402, McLean, VA 22101; phone: 703-790-1745; fax: 703-790-2672; email: HPS@BurkInc.com.