

January 1999

RADIOACTIVE MATERIALS PROGRAM Bureau of Radiation Control Information Notice 1999-01

Requirements and Responsibilities of Authorized Users in Medical Facilities

This information notice is applicable to state of Florida radioactive materials licensees performing human use radioactive materials procedures in medical facilities.

The purpose of this information notice is to raise the awareness concerning the requirements and responsibilities of authorized users.

An authorized user is defined as a physician, dentist, or podiatrist who is listed as an authorized user on a department, U.S. Nuclear Regulatory Commission, agreement state, or licensing state license that authorizes the medical use of radioactive material. There are specific training and experience requirements to be an authorized user.

Authorized users have the following responsibilities: review personally the patient's case or develop and implement adequate written procedures to assure that the diagnostic radiation procedures are appropriate; review personally the patient's case to assure the therapeutic radiation procedure is appropriate; prepare a written directive when required or assure that the procedure is in accordance with the diagnostic clinical procedures; use radioactive material or direct technologists and physicians in training in using radioactive material; interpret results of diagnostic procedures; and review regularly the progress of the patient receiving therapy and modify the originally prescribed dose if needed.

The licensee is required to make sure that authorized users perform their required duties. In the past, licensee's have been found in noncompliance with the regulations for failure to have authorized users approve the diagnostic clinical procedures manual, failure of authorized users to interpret results, and failure to have authorized users available to direct technologists and physicians in training. These requirements cannot be delegated to another physician, supervised staff or medical personnel such as physician assistants, physicists or nursing personnel. We are seeing an increase in citations where authorized users are not performing their required duties.

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This notice is to inform you that the bureau considers the involvement of authorized users as an important aspect to radiation safety of the patient, workers and the public and that we will continue to inspect and respond to allegations that address the requirements and responsibilities of authorized users. This will include citations and escalated enforcement such as administrative fines when appropriate. It is anticipated that each licensee will review their radioactive material program and make the necessary revisions to maintain compliance with the regulations. No written response is required.

For specific citations concerning authorized users you may refer to subsection 64E-5.101(16), Florida Administrative Code (F.A.C.), for the definition of an authorized user, section 64E-5.607, F.A.C., for authorized user responsibilities and section 64E-5.601, F.A.C., for licensee responsibilities. In Part VI of the regulations, there are specific requirements that you may wish to review if your facility performs certain procedures.

This notice and the regulations may also be viewed and downloaded from our website at *www.doh.state.fl.us/environment/radiation.*