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DEPARTMENT OF HEALTH  
AND ENVIRONMENT

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Division of Environment

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KANSAS INFORMATION NOTICE 07-04  
LICENSEE AND REGISTRANT RESPONSIBILITY FOR TRACKING OCCUPATIONAL DOSE

Addressees

This notice is addressed to all Kansas licensee or registrants.

Purpose

The purpose of this notice is to clarify the requirement for each licensee or registrant to track occupational dose for each individual subject to occupational dose monitoring who is performing work at the licensee's or registrant's facility.

Description of Circumstances

During recent inspection visits from the Kansas Department of Health and Environment, Bureau of Air and Radiation, practices regarding tracking of occupational dose monitoring of visiting personnel has raised questions regarding regulatory requirements of the responsibility of licensees and registrants for occupational dose monitoring.

Discussion

It is the responsibility of the licensee or registrant to determine the occupational dose for each individual who is subject to occupational dose monitoring. This process is straightforward when each individual works only for one licensee or registrant who keeps track of the dose records for one facility. When the licensee or registrant has individuals who use their facility and who also have exposure from other licensed or registered facilities, it can become difficult to track the dose received during the year. However, it is a requirement of the regulations that the licensee or registrant shall control the occupational dose (K.A.R. 28-35-212a). The regulations also require the licensee or registrant determine the prior occupational dose received during the current year and attempt to obtain lifetime cumulative occupational radiation dose (K.A.R. 28-35-212e). There are a variety of acceptable formats for these reports which are specified in 28-35-212e(c) (1-3). The licensee or registrant is required to record the exposure history on a form that must be kept until the registration or license is terminated (K.A.R. 28-35-212e(d-f)). The dose records shall be made available to inspectors from the Kansas Department of Health and Environment, Bureau of Air and Radiation upon request (K.A.R. 28-35-138).

For the licensee or registrant, what this means is that they will have to keep track of dose records for each individual required to be monitored at the facility. Each licensee or registrant must ensure that monitoring badges are worn and be able to produce documentation which shows they are tracking the current and historical doses of any individual that is using the facility who is subject to monitoring requirements.

If you have any questions please feel free to contact our office.

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