



UNIVERSITY OF CAMBRIDGE

Occupational Health and
Safety Service

memo

To Departmental RPSs

From Lisabeth Yates, Radiation Protection Officer

Date 2 June 2020

Copy to

Subject Returning to site work - radiation protection and permit compliance

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Our Ref S/IR/020620

Dear RPSs,

We're aware that many of you are involved in planning for re-opening of buildings and for returning to work onsite. We do not expect any conflicts between precautions for radiation protection and Covid-19 and you do not need specific authorisation from the Safety Office to resume radiation work, but please read and follow the instructions below and keep us informed of any problems.

The Radiation Protection Team at the Safety Office will continue to provide services. We will contact you before each visit and we will expect assurance from you regarding Covid-19 related measures following the principles outlined by the University which should be reflected in your local procedures.

EA, HSE and ONR have issued Regulatory Position Statements regarding the current arrangements and reporting requirements. Although these allow for possible non-compliances with regulations, we have been told by our local EA Inspector to make efforts not to be in breach of EPR permit conditions so arrangements are being made where necessary.

Possible non-compliances due to Covid-19 which require regulatory reporting and/or written justification

Please inform me ASAP if any of the following apply:

- Accumulation of waste not already notified to us – there are several departments which have accumulated waste which we were not able to collect before the closure of buildings. This waste will be a priority for removal, but if any permit breaches are expected, we will need to report these to EA.
- Any radiation monitors (including EPDs) in use but outside of the normal statutory 12 month test period.
- Leak tests on sealed sources exceeding the statutory 2 year interval.
- Any problems regarding classified worker dosimetry.
- Problems in attending Classified worker medicals.

Sealed, unsealed sources and waste

- Please ensure that suitable receipt arrangements are in place before ordering any sealed or unsealed radiation sources.
- Resume normal accountancy checks on all sources and waste as soon as possible and dispose of old stocks that are no longer useable.
- Contact us regarding any potential problems regarding sub-permit limits or safety issues.
- Please inform us when restarting work with unsealed sources, so that we can ensure the monthly return data is up to date and arrange collections of waste.
- Carry out inspections of areas before restarting work, and carry out checks on related equipment and disposal facilities.

Monthly returns

- Thank you for monthly returns received to date. For departments shut down from April onwards please send in all outstanding monthly returns up to and including March and please confirm by email that no unsealed work has taken place since April (this is instead of sending blank monthly returns).
- Please continue to confirm this by email at the end of each month until work resumes.
- When work resumes, you should then complete monthly returns as normal.
- On your return to the department, please check carefully to ensure no material or waste has been missed from monthly return data.
- For disposal of old stocks, decay corrections can be made but please note on the email accompanying the monthly return what corrections have been made and why.

X ray facilities

- Any routine maintenance and safety checks (e.g. that warning lights are working correctly) will need to be done prior to reopening X-ray facilities.
- Before restarting work, departments should have in place suitable (Covid-19) arrangements for shared equipment and many of the measures advised will already be in place for X-ray facilities, e.g. equipment booking systems and good layout of areas to allow distancing measures. Please contact me if any problems or questions.

Dosimetry

- We appreciate that there is uncertainty regarding when departments will return to work. Unfortunately there is a long lead time for re-instating dosimetry with a limited number of spares available at short notice, so we have arranged for all dosimetry to be available from 1 July onwards so that it is available if needed. If your department definitely does NOT need any dosimetry in July, please let us and/or CPRMS know ASAP (by the end of this week, 5th June).
- Although dosimetry will be available, it will not be sent by CPRMS to departments until reception arrangements are confirmed. If you not already receiving dosimetry and you intend to resume radiation work in July, you will need to contact CPRMS to request delivery from 1 July (or arrange collection if on the Addenbrooke's site).

- Please return ASAP any dosimetry from March or earlier (we are charged around £10 per non-returned item if not returned within 90 days, although this may be extended given the current situation).
- Please note that UMS are not yet operating normally – they may be able to deliver specific items on request, otherwise dosimetry can be sent by Royal Mail. If you do not have a CPRMS return envelope, the address for delivery is *Cambridge Personal Radiation Monitoring Service, Box 191, Addenbrooke's Hospital, Hills Road, Cambridge, CB2 0QQ*. Mark the envelope: **RADIATION SENSITIVE – do not expose to X-rays or store near radioactive material**.
- Please note that the 10th of the month is the normal cut-off date for any changes or cancellation to dosimetry.
- There will continue to be understandable delays in sending out dosimetry and results, and CPRMS have been very accommodating.

Monitor test

- We will contact departments regarding the monitor test programme which should go ahead as normal, although with some minor changes – departments on the Addenbrooke's site will be expected to take their monitors to EARRPS as well as collecting them after test as normal.

Contingency plan review

- Please review your contingency plans for foreseeable accidents as additional precautions may be needed relating to Covid-19. For radiation accidents where you may have to closely assist someone, for example, assist in removing contaminated clothing or contamination from the skin, in accordance with departmental arrangements you may want to make sure face coverings are available. For information, the following advice has been given to first aiders:
<https://www.sja.org.uk/get-advice/first-aid-advice/covid-19-advice-for-first-aiders/> .

RPS role and user responsibilities

- Please ensure there are measures in place to ensure continuing compliance with the various regulations in the event of staff absences given your specific roles (sufficient support and written instructions, e.g. for supervision of work, collating monthly return data, waste arrangements, etc.)
- Consider the need for local refresher training for users of equipment and sources where there has been a long absence from radiation work. This can be a reminder by email of key instructions or discussion by phone or Teams (but as usual, please avoid sharing detailed security related information).

I hope the above is helpful, and please do not hesitate to contact us by email or phone if any questions or concerns. We are unlikely to be re-occupying our normal offices at Greenwich House for some time, but we are able to make site visits as necessary.

Best wishes from the RP Team.

Lisabeth Yates