

NOTICE to Radioactive Material Licensees

April 13, 2020

On March 19, 2020, the Texas Department of State Health Services (DSHS) Radiation Control began receiving information that some medical facilities are limiting access to vendors due to restrictions they have implemented because of COVID-19. Those prohibitions include restricting or barring access to licensed medical physicists and contractors who conduct required surveys at authorized radioactive material licensees, which will result in a delay in conducting some physics surveys.

The Texas regulations on radioactive material (RAM) include various testing and notifications to be conducted to maintain compliance. DSHS supports facilities' efforts to protect public health and follow the Executive Orders and Declarations issued by Texas Governor Abbott and Texas Commissioner of Health, Dr. Hellerstedt. <https://gov.texas.gov/news/category/proclamation>

DSHS offers the following guidance for registrants to ensure a continuity of radiation safety during COVID-19-related restrictions.

- Licensees should continue following the current regulations.
- If the radiation safety officer or other person responsible for completing a required regulated task is unable to perform his or her duties due to illness, governmental guidance, or orders related to COVID-19, a licensee must make reasonable efforts to find another qualified individual who can timely perform the regulated task.
- All licensees must document any mitigating factors encountered during this time and make the documentation available to department inspection staff upon request. DSHS will consider extenuating circumstances that are documented when making decisions regarding compliance actions.

Compliance with the following requirements is required at all times:

- Reports of lost, stolen or missing radioactive sources
- Notification of incidents involving radioactive material
- Notification of exceeding annual dose limits
- Notification of medical events as described in current Texas regulations

For facilities that have received a Notice of Violation (NOV):



- Facilities should respond to the NOV. If facilities are unable to respond in the specified timeframe please contact the reviewer listed in the NOV.
- Facilities must document reasons corrective action or the response to the NOV was delayed or prevented and provide that documentation to the reviewer at a future date.

Direct your questions to:

- Inspection & Rule Compliance: RAMNotice@dshs.texas.gov and cc RAMASSIST@dshs.texas.gov
- Incident or Medical Event reporting:
 - Initial reports: 512-458-7460
 - Follow-Up reporting: RAMASSIST@dshs.texas.gov
- Licensing/Sealed Sources & Devices/Industrial Radiography issues: RAMLicensing@dshs.texas.gov
- Industrial Radiography Certification: bridget.stephens@dshs.texas.gov and cc Joyce.LeRoux@dshs.texas.gov
- Notices of Violation: PSQARad@dshs.texas.gov
- Compliance: alyson.henry@dshs.texas.gov

Please check back regularly for updates.