Policy Concern: This policy clarifies the recertification requirements for health care workers providing care for radiation therapy patients who are confined in accordance with 10 CFR 35.75.

Policy Implementation: The Radiation Safety Officer is directed to implement this policy upon approval by the Radiation Safety Committee. All necessary procedure changes and instructions to implement this policy must be approved by the Radiation Safety Officer.

Discussion: At the 26 March 1996 Radiation Safety Committee meeting a new retraining protocol was approved for recertifying "nurses" who care for radiation therapy patients. The previous policy called for health care workers to receive a retraining session of about one hour from a member of the Radiation Safety Office staff. The new protocol, which was developed and submitted by the Nursing Department Administrative staff, was to improve the efficiency and flexibility of the program. In lieu of a training session conducted by Radiation Safety, nurses complete a Radiation Safety Self-Learning Package, take a two part test prepared and administered by Radiation Safety, and complete Radiation Safety Level I and II competencies.

A need for clarification was identified when it was discovered the Self-Learning Package referred to "registered nurses", leading to the interpretation the requirements do not apply to LPNs. A policy statement is needed clearly stating all health care workers are covered by this program.

Additional problems were identified with the new protocol as it was implemented. Requiring the two competencies, Radiation Safety Level I and Radiation Safety Level II, in addition to the Radiation Safety Self-Learning Package, placed an administrative burden on the Radiation Safety Office over which it has no control. The Radiation Safety Office can easily track who has taken the exam and completed the self-learning package; however, many manhours were used requesting status of nurses completing the competencies. The nursing staff also used valuable time providing this information. The retraining protocol will meet regulatory and license requirements if the two competencies are removed and the Radiation Safety prepared tests and the Self-Learning Package are completed.

To make the program flexible, an option to use the previous recertification program (class attendance) should also be made available.
Policy Statement: All health care workers who have been certified in accordance with 10 CFR 35.310 and 10 CFR 35.410 to care for radiation therapy patients must be recertified on an annual basis by completing either item 1.a. or 1.b., and items 2. and 3. below.

1.a. Attend a training session of about one hour conducted by a Radiation Safety staff member.


2. Correctly identify several brachytherapy implant sources.

3. Achieve 85% on a test prepared by Radiation Safety consisting of 15 - 25 questions covering the content of the Self-Learning Package and/or the training session.

Approved by the Radiation Safety Committee on March 25, 1997