VOLUME 7

MARINE CORPS RADIATION SAFETY PROGRAM

SUMMARY OF VOLUME 7 CHANGES

Hyperlinks are denoted by ***bold, italic, blue and underlined font*****.**

The original publication date of this Marine Corps Order (right header) will not change unless/until a full revision of the MCO has been conducted.

The date denoted by blue font (left header) will reflect the date this Volume was last updated.

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CANCELLATION. The publication of this Volume cancels MCO 5104.3C, MARINE CORPS RADIATION SAFETY PROGRAM (MCRSP)

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VOLUME 7: MARINE CORPS RADIATION SAFETY PROGRAM

TABLE OF CONTENTS

REFERENCES

a) NAVSEA S0420-AA-RAD-010, Radiological Affairs Support Program Manual(NOTAL)
b) SECNAVINST 5100.10K
c) Nuclear Regulatory Commission (NRC) Master Materials License 45- 23645-01NA (NOTAL)
d) OPNAVINST 6470.3B
e) OPNAVINST 5100.23G w/CH-1
f) NAVSEAINST 5100.18B
g) DODI 4715.27
h) NAVMC 4000.5C
i) MCO 4400.201
j) DTR 4500.9-R, “Defense Transportation Regulation,” Part (2), April 2017
k) 10 CFR 71, “Packaging and Transportation of Radioactive Material,” January 01, 2018
l) 49 CFR 173, “Shippers-General Requirements for Shipments and Packaging,” October 01, 2017

VOLUME 7: CHAPTER 1

RADIATION SAFETY AND THE FOUR PILLARS

SUMMARY OF SUBSTANTIVE CHANGES

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CHAPTER VERSION	PAGE PARAGRAPH	SUMMARY OF SUBSTANTIVE CHANGES	DATE OF CHANGE

CHAPTER 1

RADIATION SAFETY AND THE FOUR PILLARS

0101 PURPOSE

Volume 7 provides the requirements applicable to the Marine Corps Radiation Safety Program. A radiation safety program is the sum of all methods, plans, and procedures used to protect human health and the environment from exposure to sources of ionizing radiation. It includes the Radiation Health Program and Radiological Controls (RADCON) Program and shall be incorporated among the Four Pillars of the Marine Corps Safety Management System (MCSMS) as much as possible.

Interpretation of Volume 7 requires knowledge of radiation safety to ensure proper implementation of a successful Radiation Safety Program. Headquarters Marine Corps, Safety Division is the final authority within the Marine Corps on the subject matter contained herein.

The purpose of the Radiation Safety Program is to preserve and maintain the health of personnel while they work in or around areas contaminated with radioactive material, or in areas where they are exposed to ionizing radiation.

The purpose of the Radiation Health Program is to protect Marine Corps personnel and the general public from hazardous or unnecessary radiation exposure from ionizing radiation sources

The purpose of the Radiological Controls Program is to ensure commands' radiological operations are conducted in a manner that ensures the health and safety of all service members, government employees, contractors, and the general public. To achieve this objective, commands shall ensure that radiation exposures to its personnel, public, and releases of radioactivity to the environment are maintained below regulatory limits, and deliberate efforts are taken to further reduce exposures and releases as low as reasonably achievable.

Combined, these programs assure protection of personnel, property, and the general public during routine operations and emergency situations involving ionizing radiation.

0102 DON RADIATION HEALTH PROTECTION

A. Exposure to personnel from ionizing radiation must be reduced to levels as low as reasonably achievable (ALARA). Efforts will be made to fulfill this objective without com-promising operational and training efforts.

B. Personnel engaged in work with the risk of being exposed to ionizing radiation must be trained in radiological controls and radiation safety practices and protective measures.

C. Supervisors of personnel working with radioactive materials or devices that produce ionizing radiation shall be cognizant of their responsibilities regarding the

execution of safety and protective measures.

D. Proper protective equipment, and training in its use, must be available to and utilized by all occupationally exposed personnel.

E. Personnel not employed by the Department of the Navy (DoN) must comply with these regulations when engaged in a Marine Corps-sponsored program or operation.

F. It is recognized that these regulations may not be applicable to procedures initiated after an accident, incident, or attack in which a radiological or nuclear device is utilized; however, the provisions of these regulations, insofar as they are feasible, must remain in effect after such an attack.

Volume 7 complies with federal, Department of Defense (DoD) and DoN radiation safety program requirements. Additional site-specific requirements may be contained within Navy Radioactive Material Permits (NRMPs) that supplement the direction of this volume.

0103 RADIOLOGICAL AFFAIRS SUPPORT PROGRAM (RASP)

The RASP has established mechanisms for the receipt, ownership, possession, use, repair, maintenance, storage, distribution, transportation, and disposal of all sources of ionizing radiation within the Marine Corps for operational, industrial, and research activities, afloat and ashore. These mechanisms include RASP Standard Applications, RASP Information Notices, RASP Policy Memoranda, and RASP Regulatory Guides.

These potential radiation sources include Nuclear Regulatory Commission (NRC) licensed radioactive material, radioactive waste, machine sources such as x-ray machines, particle accelerators, electron microscopes, laboratory analytical devices, vehicle and package inspection systems, and all other equipment capable of producing ionizing radiation.

The RASP also applies to commodities containing radioactive material, such as electronic devices (electron tubes), luminescent/self-illuminating devices (watches), ionization devices (smoke detectors), analytical devices (gauges), and those containing natural radioisotopes (aircraft/vehicle parts and welding rods) that are not specifically licensed by the NRC.

Finally, the RASP applies to environmental restorations associated with general radioactive materials and the Department of the Navy (DON) low-level radioactive waste (LLRW) disposal program. It is the DON's goal when using RASP sources to keep occupational radiation exposures as low as reasonably achievable (ALARA) and never exceed the federal limits. To accomplish this goal, commands who use RASP sources must implement a radiation safety program, incorporating the Four Pillars of the MCSMS.

0104 RADIATION SAFETY PILLARS

This guidance applies to all Marine Corps activities possessing or using sources of ionizing

radiation which may affect the health of personnel.

Volume 7 supports MCSMS by providing a system of radiological safety practices and controls to be implemented on a command-to-command basis and should be tailored to meet radiation safety needs. Commensurate with Volume I, this volume provides guidance for increasing command involvement in identification and implementation of appropriate controls. Like the RADCON process, an effective MCSMS emphasizes the development and implementation of controls that are commensurate with the hazards associated with any specified activity. Failure to effectively implement and manage the Radiation Safety Pillars of the MCSMS may lead to unnecessary risk, resulting in damage to equipment and or injury to personnel, reducing mission effectiveness. Additionally noncompliance will result in the appropriate Nuclear Regulatory Commission enforcement actions.

VOLUME 7: CHAPTER 2

ROLES AND RESPONSIBILITIES

SUMMARY OF SUBSTANTIVE CHANGES

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CHAPTER 2

ROLES AND RESPONSIBILITIES

0201 GENERAL

Federal regulations for radiation protection are issued by the Nuclear Regulatory Commission (NRC), Department of Health and Human Services, Department of Labor, Department of Transportation, and the Environmental Protection Agency. Instructions, manuals, and work procedures are issued by the Department of Defense, Chief of Naval Operations (CNO), and Commandant of the Marine Corps (CMC).

0202 ROLES

A. Per reference (b), the Secretary of the Navy assigned CNO the responsibility to establish and manage the Navy Safety and Occupational Safety and Health Program, including the promulgation of appropriate directives, in coordination with the CMC for those matters that affect the U.S. Marine Corps. The CNO and CMC must exercise overall coordination and policy control of the radiation protection programs under their cognizance in the fields of organization, equipment, safety, personnel qualifications, assignments, and training. Unless superseded or stated otherwise, the requirements of this volume shall be incorporated into the command policies, procedures and practices upon issuance.

B. The NRC issued reference (c), a Master Materials License (MML), to the DoN to control the receipt, acquisition, possession, use, and transfer of NRC regulated Radioactive Material (RAM) at Navy and Marine Corps activities. Reference (d) established the Naval Radiation Safety Committee (NRSC) to provide control and dispose of all RAM used in the Navy and Marine Corps; except for nuclear propulsion reactors and associated radioactivity, nuclear weapons, munitions and/or subsequent components thereof. NRMPs are used to maintain this control. Radiation Safety Officers (RSO's), Assistant Radiation Safety Officers (ARSO's), Radiation Safety Managers (RSM's), and Radiation Protection Assistants (RPA's) shall be employed to manage Marine Corps radiation safety programs and ensure NRMP compliance with the NRC.

C. Per reference (e), CNO described and assigned to Commander, Naval Sea Systems Command (COMNAVSEASYSCOM), specific program responsibilities pertaining to ionizing radiation. Per reference (f), COMNAVSEASYSCOM is the Technical Manager for the Radiological Affairs Support Program (RASP) to act authoritatively on matters concerning Radiological Controls (RADCON). The RASP is the responsibility of NAVSEASYSCOM (SEA 04N) and includes all aspects of radiation safety with respect to the design, construction, and control of radiation from ionizing radiation producing machines (x-ray devices, accelerators, etc.) as well as from RAM not otherwise controlled by Naval Nuclear Propulsion, Navy Medicine, or the Strategic Systems Program.

D. The Chief, Bureau of Medicine and Surgery is responsible for the Radiation Health Program (RHP) that serves the Navy and Marine Corps. The RHP includes the areas of medical examinations, radiation protection standards, exposure records, personnel dosimetry, and all ionizing radiation producing machines and sources within medical treatment facilities. Successful radiation protection programs include Radiation Health and Radiation Safety elements.

E. Per (e), NAVSEA DET RASO serves as technical support center to SEA 04N and the NRSC. NAVSEA DET RASO also provides guidance to Navy and Marine Corps commands in the following areas:

1. Naval Radioactive Materials Permit Program. NAVSEA DET RASO, as the technical support center, provides guidance on applying for and maintaining individual command NRMPs.

2. X-ray Radiography. NAVSEA DET RASO provides guidance on establishing and maintaining IRPMAs for x-ray radiography programs.

3. Other Usage Codes. NAVSEA DET RASO also provides guidance on establishing and maintaining programs that do not require an NRMP or involve radiography. These usage codes are listed within reference (a) table 4-1 and while they may not require a permit, commands interested in acquiring and utilizing a new radiological asset need to consult with CMC (SD) to fully understand the requirements necessary to manage the safety program for the asset.

4. Naval Low-Level Radioactive Waste (LLRW) Program. NAVSEA DET RASO manages the Navy's LLRW Program that covers all RASP-related LLRW generated by the Navy and Marine Corps. The program also provides contractual support for both command-specific and Naval Facilities Engineering Command managed radiological contamination and remediation projects at Navy and Marine Corps commands. The program is an integral part of the Department of Defense (DoD) LLRW Program managed by the U.S. Army per reference (g). Any alternative path for disposal of waste shall be initiated and coordinated via CMC (SD).

5. Radiation Safety Training. NAVSEA DET RASO provides initial qualification training, continuing education, symposiums, and communities of practice to prospective RSO's and ARSO's.

F. To accomplish radiation safety responsibilities in the Marine Corps, the Director, SD shall maintain an effective and unified Marine Corps Radiation Safety Program (MCRSP) in coordination with COMNAVSEASYSCOM and appoint a member to the NRSC. The appointed NRSC member shall be knowledgeable in the MCRSP and shall function as liaison and central point of contact for radiological affairs within the Marine Corps. Appendix A shows the functional chain of command for the MCRSP.

G. Marine Corps commands can submit applications for NRMPs to use NRC regulated radioactive materials in a local radiation safety program. Applications are submitted via the chain of command to CMC (SD) for endorsement and forwarding to NAVSEA DET RASO for review and processing. When an NRMP is issued, the command shall comply with its locally developed operating procedures, NRMP requirements, and applicable Federal regulations. Non-compliance with NRMP requirements could impact not only an individual command program, but could implicate all NRMPs across the Navy, with potential adverse consequences involving life-saving medical treatment of patients, critical repairs of ships and aircraft, and research and development of warfighting technologies.

H. Marine Corps commands interested in acquiring generally licensed or exempt quantity devices shall contact CMC (SD) to discuss the programmatic requirements prior to acquisition. CMC (SD) shall liaise between the Command and RASO to ensure all requirements are understood and implemented prior to acquisition.

I. NRMPs are also issued to Major Commands with the ultimate goal of distribution of radioactive assets to the fleet. Any command storing, utilizing or deploying with these assets shall abide by its locally developed operating and safety procedures, NRMP requirements, associated Major Command orders, and applicable Federal regulations. Failure to comply with these requirements can jeopardize the NRMP, and potentially the MML.

J. Industrial x-ray radiography represents a potential for serious radiation injury to radiography personnel and members of the general public. In order to minimize the hazard, it is incumbent upon all radiography-capable Marine Corps commands to operate their programs in strict compliance with standards established in reference (a). These standards reflect the minimum radiation safety requirements necessary to safely conduct x-ray radiography operations. In addition to the requirements in reference (a), each Marine Corps radiography command will establish Standard Operating Procedures (SOPs) which will incorporate any additional radiation safety measures necessary to support command operations, as dictated by local conditions.

0203 RESPONSIBILITIES

020301. DIRECTOR, COMMANDANT OF THE MARINE CORPS (CMC) SAFETY DIVISION (SD)

A. Appoint in writing, a qualified Naval Radiation Health Officer (RHO) to serve as Senior Marine Corps Health Physicist at CMC (SD). This RHO shall be responsible for the following actions:

B. Oversee management of all NRMPs issued to Marine Corps commands and take appropriate actions to ensure compliance with this Order and all other applicable directives.

C. Serve as a voting member of the NRSC and function as the liaison and central point of contact for radiological affairs within the Marine Corps.

D. Develop and implement Marine Corps policies regarding the Radiation Safety Program.

E. Develop, maintain, and provide training programs for material and processes not covered by NAVSEA DET RASO training programs, to all Marine Corps RSOs and Managers.

F. Provide advice to Marine Corps commands on radiation safety matters.

G. Except as specified in an NRMP, serve as the primary point of contact for the reporting of incidents involving applicable radioactive assets. This includes generally licensed and license-exempt radioactive assets, and items not otherwise specifically permitted for use in the Marine Corps (i.e., unknown radioactive assets or items that bear the radioactive materials symbol that may belong to the Marine Corps).

H. Conduct biennial (every two years) assessments of all Marine Corps NRMPs, x-ray radiography operations, analytical measurement instrument programs and other codes listed in reference (a) table 4-1.

I. Assist in coordinating the procurement of radioactive assets by Marine Corps commands to ensure adequacy of permit coverage and establishment of radiation safety.

J. Provide technical assistance that is beyond the ability (training and experience) of local resources.

K. In coordination with the Capabilities Processing Branch within the Capabilities Development Directorate at Marine Corps Combat Development Command, review all Urgent Universal Needs Statements (UUNS) through the Virtual UUNS (VUUNS) system. This review will focus on any capabilities solution or recommendation that may have ionizing radiation components.

020302. COMMANDING GENERAL (CG), MARINE CORPS LOGISTICS COMMAND (MARCORLOGCOM)

A. Coordinate the Inter-Service Support Agreements with the Defense Logistics Agency (DLA) for radioactive asset storage and distribution requirements.

B. Provide disposition instructions for radioactive assets in the Marine Corps using the current Accountability Property System of Record and directives.

C. Ensure Equipment Specialists and Item Managers have the appropriate training and awareness to provide detailed instructions for special handling, demilitarization, and transportation of radiological assets.

D. Direct and maintain inventories of MARCORLOGCOM NRMPs and NRC regulated and exempt radioactive assets.

E. Assign appropriate authority, responsibility, and funding to the MARCORLOGCOM Radiological Controls (RADCON) Office to ensure compliance with this Order and all NRMPs issued to CG MARCORLOGCOM.

F. Ensure adequate resources are available for supporting radioactive sample analysis and instrument calibration as a service to other Marine Corps commands as required by specific NRMPs.

G. Promulgate radiation safety compliance requirements commensurate with materiel management and supply procedures to support Marine Corps equipment containing radioactive sources.

H. Establish and maintain oversight for Marine Corps stock, storage, issue, and use of MARCORLOGCOM licensed radiological assets.

I. Receive, consolidate and report results of semi-annual inventories of radiological assets from each applicable Marine Corps unit associated with MARCORLOGCOM NRMPs. The RSO shall submit a copy of the inventory to NAVSEA DET RASO no later than 31 January of each year that includes all inventoried RASP radioactive assets and machines possessed by the command on 31 December of the preceding year.

020303. COMMANDER, MARINE CORPS SYSTEMS COMMAND (MARCORSYSCOM)

A. Coordinate the development, procurement, acquisition, testing, evaluation, and distribution of systems involving ionizing radiation sources, or equipment containing RAM with CMC (SD) and MARCORLOGCOM, RADCON Division. This coordination ensures compliance with new or established NRMPs or NRC licenses. Coordination with MARCORLOGCOM will ensure that radioactive assets are managed properly by MARCORLOGCOM, which is responsible for the maintenance, repair, replacement, storage, and distribution of all materials brought into the Marine Corps inventory.

B. Coordinate the procurement of any generally licensed or license-exempt radioactive assets with CMC (SD) and MARCORLOGCOM, RADCON Division. Reference (a) and Appendix B requirements must also be met for generally licensed radioactive asset acquisition.

C. Direct and maintain inventories of MARCORSYSCOM NRMP and NRC regulated and exempt radioactive assets.

D. Assign appropriate authority, responsibility, and funding to the MARCORSYSCOM RSO to ensure compliance with this Order and all NRMPs issued to CG MARCORSYSCOM.

E. Assign, in writing, a Command Radiation Safety Manager (CRSM) to oversee NRMP compliance, at each command, that receives, uses, handles, and stores

radioactive assets or produces ionizing radiation.

F. Incorporate Marine Corps radiation safety requirements in the research, development, testing, and evaluation phases for an end item or system component that contains RAM or is a source of ionizing radiation. Make appropriate provisions for specific licensing and disposition requirements when planning life-cycle management of new systems.

G. Coordinate with CMC (SD) the promulgation of documents for radioactive assets to ensure the availability of training, maintenance, and pertinent regulatory information.

H. Establish and maintain oversight for Marine Corps stock, storage, issue, and use of MARCORSYSCOM licensed radiological assets.

I. Receive, consolidate and report results of semi-annual inventories of radiological permitted assets associated with MARCORSYSCOM NRMPs. The RSO shall submit a copy of the inventory to NAVSEA DET RASO as required by reference (a).

020304. MARINE CORPS TOTAL FORCE

Specifically, Commanding General, MCCDC; Commander, U.S. Marine Corps Forces Command; Commander, U.S. Marine Corps Forces Pacific; Commander Marine Corps Installation Command; Commander, U.S. Marine Corps Forces Reserve; Commander, U.S. Marine Corps Forces Special Operations Command; Commander Marine Corps Forces Europe/Africa; Commander Marine Corps Forces Central; Commander, U.S. Marine Corps Forces Korea; and Commanding General, Marine Corps Recruiting Command.

A. Ensure that radiation safety programs reflect command support and fulfill the requirements of NRMPs and their associated orders (see Appendix B) as well as applicable host-country and federal regulations.

B. Ensure subordinate commands adhere to the requirements of this Order and applicable NRMP requirements and their associated orders (see Appendix B). This includes pertinent requirements laid out in reference (a).

C. Publish procedures implementing formal radiation safety programs in accordance with reference (a), pursuant to the requirements of this order, and commensurate with command operations involving sources of ionizing radiation..

D. Assign, in writing, a Major CRSM (MCRSM) to oversee radiation safety compliance of subordinate commands as applicable.

E. Report any incidents of loss, theft, or damage of radioactive assets to CMC (SD), to include reporting to the pertinent RSO for any permitted items.

F. Coordinate the procurement of any generally licensed or license- exempt radioactive assets with CMC (SD).

020305. COMMANDING GENERAL (CG), TRAINING AND EDUCATION COMMAND (TECOM)

A. Ensure training and readiness manuals and programs of instruction for equipment containing and operations utilizing radioactive assets or capable of producing radiation, include basic radiation safety information and training.

B. Coordinate with CMC (SD) on obtaining subject matter expertise for the radiation safety training material.

C. Coordinate the procurement of any generally licensed or license-exempt radioactive assets with CMC (SD).

020306. RADIATION SAFETY OFFICERS (RSO)

The RSO is directly responsible for the radiation safety program associated with an NRMP, x-ray radiography, and other usage codes listed in reference (a) Table 4-1. Installation instructions, Command safety instructions, and position descriptions using the term/title RSO shall be stricken unless they meet the requirements of Table 4-1 in addition to section 0203.F.3 below.

A. ARSOs are assigned to assist an RSO and/or manage the program in the stead of an RSO per reference (a) guidelines.

B. All other radiation safety personnel in the Marine Corps shall be designated as an RSM, MCRSM, CRSM, IRSM, URSM or a RPA. Radiography personnel are responsible for safe operations of radiographic equipment, but are not considered radiation safety personnel.

C. Prior to assuming duties as the RSO, the following are required:

1. Successful completion of the applicable RSO course(s) provided by NAVSEA DET RASO. Only designated, or soon to be designated, RSOs that meet the above requirements shall be given consideration for attendance.

2. For an NRMP RSO the following are required:

a. A signed NRMP amendment listing the RSO on the permit.

b. Attend the RSM course within three months of being designated as the RSO on a permit.

3. For an x-ray radiography RSO the following are required:

a. Appointment in writing as the IRPMA RSO, with RASO concurrence.

b. X-ray radiographers will only be required to attend RSM training if they are also assigned in writing as an RSM.

D. For all other non-NRMP and non-radiography usage codes (see reference (a) table 4-1), that require an RSO, will require the following:

1. The RSO shall ensure all requirements within reference (a) for their specific program are met.

2. The RSO will only be required to attend RSM training if they are also assigned in writing as an RSM. The RSO shall:

a. Per reference (a), be designated in writing (see Appendix C) by the commanding general, commander, or commanding officer directly (i.e., not "By direction") and document in writing their acceptance of the responsibilities and position of RSO.

b. Have independent authority to stop operations associated with their NRMP, x-ray or other usage code program that they consider unsafe.

c. Have sufficient time and commitment from management to fulfill their duties and responsibilities as outlined in their specific NRMP or IRPMA, all radiation safety directives and their local SOP, to ensure that radioactive assets and/or sources of ionizing radiation are used in a safe manner.

d. Have direct, unimpeded access to the commanding general, commander, or commanding officer for all matters concerning radiation safety.

e. Recommend to the commanding general, commander, or commanding officer a suitable candidate to serve as ARSO with the same training and qualifications as the RSO.

f. Ensure that a radiation safety review, audit, and inspection program is implemented and results are forwarded to the commanding general, commander, or commanding officer via the chain of command and that program deficiencies are corrected expeditiously.

g. The RSO or ARSO shall provide an annual commander's brief to the commanding general, commander, or commanding officer on the status of the radiation safety program for which they are responsible. This briefing shall include the general topics listed in reference (a), Sections 2.8.2.3 items a. through i., all inspections or assessments since the last commander's brief and any NRMP actions or correspondence. A copy of the completed brief, signed by the CO, and a copy of the Annual Program Review, shall be forwarded to CMC (SD) for review.

h. Complete refresher training as outlined in reference (a), Section 2.8.3.

E. To maintain proficiency in radiation safety practices and to remain current with guiding regulations, the RSO and ARSO, shall complete continuing training credits in accordance with reference (a). Credits may be earned by attending the annual RSO Communities

of Practice (COP), and completing other RASP-sponsored and virtual training courses. If this requirement cannot be met, the RSO and ARSO shall be required to successfully complete the RSO course again. RSOs shall attend the COP that is most appropriate for the program that they are managing.

F. RSOs shall notify CMC (SD) of deficiencies in RSM manning per Appendix B.

G. RSOs may serve as RSMs, once trained as an RSM, however the RSO must be in a position that bears responsibility for and has visibility of the radioactive asset.

020307. RADIATION SAFETY MANAGERS (RSM)

The RSM is the individual responsible for the coordination and management of a Radiation Safety Program at all levels of command via the guidance of the respective RSO (when considering specifically licensed items), higher headquarters, and CMC (SD). The term RSM refers generically to all RSM's (MCRSM, CRSM, IRSM, and URSM). The RSM will support the entire spectrum of radioactive assets throughout the Marine Corps.

A. An RSM shall manage all specifically licensed and generally licensed radioactive assets in direct support of the RSO's NRMP at their command.

B. For all exempt quantity assets an RSM shall ensure a qualified RPA is assigned responsibilities over the assets.

1. Requests for exemption from requiring an RSM within exempt quantity only programs will be made directly to CMC (SD) via the chain of command.

2. Exemptions shall expire after three years or if the command acquires a specifically or generally licensed asset, whichever comes first.

C. As appropriate to the level of the command, the RSM general duties and responsibilities include, but are not limited to:

1. Develop and implement the appropriate level radiation safety SOP, and publish and distribute applicable messages, bulletins, or notices, as required.

2. In coordination with the installation logistics office, develop and implement procedures for shipping radioactive assets. Those procedures shall establish and maintain a logbook that documents the receipt and transfer of radioactive material. At a minimum, the logbook shall contain the asset name, national stock number (NSN), serial number (if applicable), radioactive isotope, original radioactive quantity (in terabecquerels (TBq), given 1 TBq = 27.027 Ci), pre-shipping radiation surveys, date, time, and name of person packaging the items.

3. Maintain inventories and storage locations of radioactive assets located within their purview and provide the quantities and locations of those assets to the IRSM. If

there is no IRSM assigned within your installation, then report locations of radioactive inventories to the fire department and emergency response personnel and as applicable, provide periodic training to these organizations on emergency response procedures involving radiation sources.

4. Coordinate the procurement of any generally licensed or license-exempt radioactive assets with CMC (SD) and MARCORLOGCOM, RADCON Division. The MCRSM will be notified of any acquisition and the IRSM will also receive notification prior to procurement of said asset and upon receipt.

5. Establish local procedures and maintain close liaison with the Defense Logistics Agency Disposition Services (DLA-DS) and other base organizations to prevent the unauthorized transfer or delivery of any radioactive assets to the DLA-DS. This includes license-exempt radioactive assets "Controlled Items - Sensitive" military equipment. Ensure the Marine Corps Base Installation establishes a local unwanted/unserviceable "military equipment with radioactive materials" (i.e., URM) storage area for ultimate disposal by the Low-Level Radioactive Materials Program.

6. Maintain liaison with the RSO and other RSMs within the installation or command that have been appointed oversight of specific radiation safety programs (RADIAC calibration laboratory, x-ray radiography, etc.).

7. Serve as the point of contact for radiological incident reporting, to include receiving initial notification of broken, damaged, or leaking radiological sources, or the receipt of a radiological shipment with damaged packaging. The RSM shall contact the IRSM (Base/ Installation Safety if no IRSM exists) as soon as possible when such an incident transpires, to discuss appropriate actions and receive guidance on response and cleanup. The RSM shall make notification of such incidents to the NRMP RSO and CMC (SD) and provide support for leak test and contamination survey requirements resulting from such incidents per Appendix B.

8. Report to the IRSM any requests for or identification of external sources of ionizing radiation being brought onto the installation by outside contractors, DoD services, or federal agencies. Examples include, but are not limited to, x-ray/gamma radiography operations, moisture density testing, or testing of research and development equipment. In the absence of an IRSM contact CMC (SD) with the pertinent information.

9. Conduct leak tests and contamination surveys in accordance with Orders and Instructions specified in Appendix B.

10. Coordinate and track the initial and periodic training and actions of appointed Radiation Protection Assistants in the administration of command radiation safety programs. Prepare and conduct command specific training with new RPAs to familiarize them with the command and assets for which they will be responsible.

11. Retain responsibility for RPA's actions that are appointed to assist them in their radiation safety program.

D. RSMs shall coordinate the disposal or transfer of any unwanted radioactive assets from the command with CMC (SD) via their chain of command for licensed or generally licensed radioactive assets and request disposition instructions from the appropriate Item Manager (see Appendix B for POC information). For operational equipment, send to the URM storage area or return to the Primary Inventory Control Activity (PICA). Requests for disposition must be submitted to the Item Manager in accordance with references (a), (h) and (i).

E. All RSMs shall successfully complete Radiation Safety Manager training endorsed by CMC (SD) within 3 months of assuming duties as RSM.

1. CMC (SD) owns RSM training and coordinates training for Marine Expeditionary Forces (MEF) annually and upon request given sufficient attendees, lead-time, and resources. Requests for RSM training shall be sent to CMC (SD) and MARCORLOGCOM, RADCON Division for evaluation. CMC (SD) approves the MARCORLOGCOM, RADCON Division announcement released annually, providing COP, RSM training, and site audit information.

2. In order to maintain proficiency in radiation safety practices and to remain current with guiding regulations, all RSMs designated in writing shall accumulate three continuing education credits approved by CMC (SD) within the previous five years. Credits may be earned by attending the annual USMC COP (1 credit attendee, 2 credits lecturer), and RSM-RADCON (RSM-R) training (2 credits). If this requirement cannot be met, the RSM shall be required to successfully complete the RSM course again within the 5-year period after initial completion.

020308. MAJOR COMMAND RADIATION SAFETY MANAGER (MCRSM)

The MCRSM is the individual designated in writing at the major command level. Because major commands do not typically possess radioactive assets, the MCRSM will normally be responsible for oversight of subordinate command RSMs, RSOs, and their associated programs. Whenever possible, assignment of the major command RSM should be from the major command safety office. Designation letters and training certificates (see Appendix C) for MCRSMs shall be forwarded to CMC (SD). Exemptions from this MCO 5100.29 requirement shall be considered for programs that only possess exempt quantity assets.

020309. COMMAND RADIATION SAFETY MANAGER (CRSM)

The CRSM is the individual designated in writing at the Marine Expeditionary Force (MEF) or Major Subordinate Command (MSC) level who is responsible for coordinating the Radiation Safety Program for sources of ionizing radiation under the control of that MEF or MSC. Designation letters and training certificates (see Appendix C) for CRSMs shall be forwarded to the MCRSM.

Whenever possible, assignment of the CRSM should be from the command safety office. Exemptions from this requirement shall be considered for programs that only possess exempt quantity assets. Additional duties for the CRSM are as follows:

A. The CRSM will be responsible for administering access to Radiation Protection Assistant (RPA) training for their Area Of Responsibility (AOR).

B. The CRSM shall maintain an accurate roster of URSMs that fall within their AOR and will provide a copy annually to the MCRSM and the respective RSO (utilize Appendix B to determine which RSO(s)).

020310. UNIT RADIATION SAFETY MANAGER (URSM)

URSMs shall be E-5 and above and designated to support specifically licensed and generally licensed radioactive assets in which the RSO/ARSO responsible for said license is not geographically located and per Appendix B. Designation letters (see Appendix C) for URSMs shall be forwarded to the CRSM and the IRSM.

020311. INSTALLATION RADIATION SAFETY MANAGER (IRSM)

The IRSM is the individual designated in writing by the commanding general, commander, or commanding officer at the installation, base, air station, combat center, or other fixed activity, who is responsible for coordinating the Radiation Safety Program for sources of ionizing radiation under the control of that installation, as well as maintenance of an inventory of all radioactive assets physically located on the installation.

A. Whenever possible, assignment of the IRSM should be from the installation safety office.

B. The IRSM shall successfully complete RSM–R training endorsed by CMC SD within six months of assuming the duty of IRSM.

1. Once qualified the IRSM shall retake RSM-R within five years as part of their continuing education credits or requalification per 0202.E.2 of this volume.

2. IRSMs who also hold the title of RSO (excludes radiographer RSOs) are also required to attend RSM-R for continuing education credits or requalification per 0202.E2.

C. Upon notification of a spill or breach of radioactive assets by a tenant command on the installation, the IRSM shall direct recovery actions in coordination with the NRMP RSO and/or CMC (SD). The tenant command RSM/RPA will provide any/all support necessary to the IRSM to ensure a safe recovery from the spill or breach. This in no way makes the IRSM responsible for any reporting or disposition requirements.

D. The IRSM's contact info shall be posted within all components of an installation that store/use radioactive assets to include instructions to contact the IRSM in the event of theft, loss, or damage should the designated RSM/RPA not be available or an RSM/RPA is not assigned to the space.

E. The IRSM as applicable, shall provide periodic training to emergency response organizations on response procedures involving radiation sources within the scope of

their installation.

F. The IRSM shall report inventory locations and quantities of all radioactive assets on the installation to the fire department, custodians, and emergency response personnel upon initial receipt of assets, change of location, and annually.

G. The IRSM shall report to CMC (SD) any new requests for or identification of any external sources of ionizing radiation being brought onto their installation by outside contractors, DoD services, or federal agencies, whether for storage or utilization, to ensure a Radiological Contract Oversight Management Authorization (RCOMA) has been processed as necessary per reference (a). Examples include, but are not limited to, x- ray/gamma radiography operations, moisture density testing, or testing of research and development equipment.

H. Designation letters (see Appendix C) for IRSMs shall be forwarded to CMC (SD).

020312. RADIATION PROTECTION ASSISTANT (RPA)

The RPA is the unit-level, collateral duty radiation safety professional, and is appointed by the Commanding Officer/ Officer-In-Charge to assist the RSM in administration of the command radiation safety program. RPAs shall be assigned to support license exempt radioactive assets. An RPA is not authorized to assume the responsibility for the management of specifically licensed or generally licensed radioactive assets in the stead of an RSM with the exception of deployable units where an RPA can support the program in the stead of an RSM until another RSM can be trained. Under these circumstances, the RPA shall be designated in writing as the RSM, assuming the responsibilities of the program, and will thus be required to attend RSM training within three months unless another candidate has been identified to replace the RSM.

A. RPAs shall successfully complete a radiation safety training program endorsed by the CMC (SD) within three months of assuming duties as RPA and shall complete an annual refresher thereafter. CMC (SD) provides the training material to RSMs to administer all RPA training.

B. RPAs shall maintain an inventory of radioactive assets within the unit.

C. In the event any inventory items, which the RPA is aware of and assists with, are broken, damaged, or leaking, the RPA shall contact the IRSM, via the chain of command, to receive guidance on response, cleanup, and disposal of the radioactive asset.

D. Report to the IRSM, via the chain of command, any requests for or identification of external sources of ionizing radiation being brought onto the installation by outside contractors, DoD services, or federal agencies. Examples include, but are not limited to, x-ray/gamma radiography operations, moisture density testing, or testing of research and development equipment. In the absence of an IRSM contact CMC (SD) with the pertinent information.

020313. RESPONSIBLE OFFICER (RO)

The unit having custody of licensed or permitted radioactive assets must assign an RO. The RO is appointed in writing by the Commanding Officer and assumes custodial responsibility for property and accountability of supplies for units. The RO shall receive radiation safety training that is commensurate with one's duties and responsibilities. The RO shall be responsible for the following actions:

A. Perform or ensure the conduct of radiation safety program requirements for the receipt, handling, storing, physical inventory, packaging, and shipping of licensed sources of ionizing radiation.

B. Respond to radiological inventory inquiries within specified tasking timelines. Semi-annual inventories will be conducted and submitted to the permit holder within 30 days of tasking date.

C. Obtain the signature on inventories of radiological assets from the assigned Commanding Officer (CO)/ Accountable Officer (AO) in accordance with reference (h).

D. Perform or ensure that documentation and reporting requirements are fulfilled.

020314. ACCOUNTABLE OFFICER (AO)

Accountability of radiological assets is the responsibility of the assigned AO. In accordance with reference (i), accountability of public resources is inherent to command. In pecuniary (monetary) and fiduciary (trusted person responsible for money and property) terms, this responsibility is a commander's role as an AO.

VOLUME 7: CHAPTER 3

COORDINATING INSTRUCTIONS

SUMMARY OF SUBSTANTIVE CHANGES

Hyperlinks are denoted by ***bold, italic, blue and underlined font*.**

The original publication date of this Marine Corps Order (MCO) Volume (right header) will not change unless/until a full revision of the MCO has been conducted.

All Volume changes denoted in blue font will reset to black font upon a full revision of this Volume.

CHAPTER VERSION	PAGE PARAGRAPH	SUMMARY OF SUBSTANTIVE CHANGES	DATE OF CHANGE

CHAPTER 3

COORDINATING INSTRUCTIONS

0301 MAINTENANCE

Maintenance on equipment containing radioactive assets shall only be conducted per the following guidance:

A. Maintenance shall only be conducted in accordance with the equipment's Source Maintenance, Recoverability, and Code (SMRC), as described in the equipment's technical manual.

B. The radiation safety for facility maintenance operations must adhere to the requirements delineated in the specific NRMP (see Appendix B for further guidance).

0302 UNWANTED RADIOACTIVE MATERIAL (URM) AND LOW-LEVEL RADIOACTIVE WASTE (LLRW)

A. In the Marine Corps, URM includes items that contain intact and unbroken radioactive assets for which the possessing command has no further use. These items include, but are not limited to, license-exempt radioactive assets, e.g., advanced combat optical gunsights (ACOG), rifle combat optics (RCO), and tritium compasses. RSOs, RSMs, and IRSM's should contact the appropriate Item Manager for disposition instructions on these items (see 0202 D.).

B. LLRW includes assets that contain RAM or any item which is contaminated with RAM, or any radioactive asset which is known to be broken and leaking RAM. Once designated as LLRW, the RSO will work directly with NAVSEA DET RASO to coordinate the disposal. The RSM shall contact CMC (SD) via their chain of command for all matters concerning actual or potential LLRW under their purview.

C. Items designated for disposal and transfer as LLRW will only be added to the LLRW pickup list if approved by RASO. Therefore, close coordination with NAVSEA DET RASO is required to ensure proper classification and final disposition of anticipated LLRW. Do not transfer unwanted radioactive assets for demilitarization to the DLA-DS.

0303 TRANSPORTATION OF RADIOACTIVE MATERIALS

A. The transportation of RAM is regulated by references (j), (k), and (l) and shall only be certified and shipped by qualified individuals per reference (j).

B. Shipments of RAM shall be carefully coordinated with the local DLA office and the installation Traffic Management Branch, as applicable, to ensure all regulations pertaining to shipment of RAM are followed.

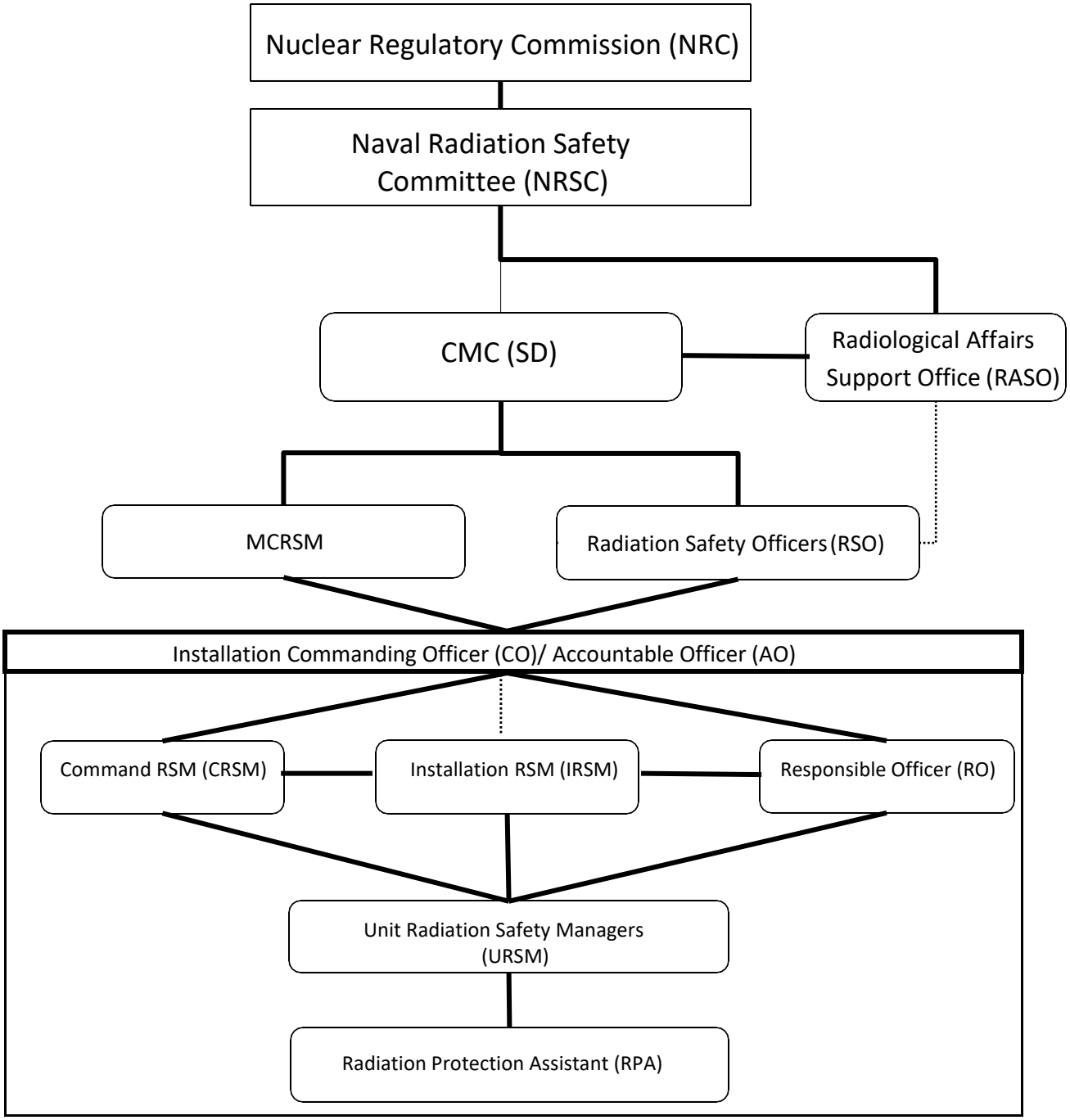
C. A RAM Movement Form available on-line at: https://navalforms.documentservices.dla.mil/web/public/forms, shall accompany radioactive asset movements to include on-base permanent transfer from one building to another, transfer from one command to another, and for any RAM being prepared for shipment.

D. A RAM Movement Form is not required for temporary movement of items remaining on the installation; however, all personnel must take appropriate safety measures and comply with protocol found in references (j) and (k) while transporting radioactive material.

E. The RSM will ensure that a copy of each completed RAM Movement Form is provided to the IRSM (CRSM if there isn't an IRSM) and maintained on file at the generating command for seven years. After seven years, original RAM Movement Forms shall be turned over to the IRSM (CRSM if there isn't an IRSM) to be retained indefinitely in accordance with reference (a).

APPENDIX A

MARINE CORPS RADIATION SAFETY PROGRAM (MCRSP) LINES OF COMMUNICATION



Direct lines of communication *
Alternate lines of authorized communication

Although RSMs and RSOs have direct lines of communication with higher commands, they should continue to keep their chain of command informed.

APPENDIX B

RADIATION SAFETY MANAGER (RSM) DESIGNATION AND DIRECTIVES

1. The following guidance is designed to clarify where to designate Unit Radiation Safety Managers (URSM) and the guidance that shall be adhered to in their radiation safety program in order to comply with Naval Radioactive Material Permit conditions, the associated orders to the NRMP, and ultimately the federal regulations. All other permits associated with the Marine Corps have a local dedicated RSO and thus don't require URSMs unless specified within their permit conditions, the associated orders, or at the discretion of their RSO.

   a. Commander Naval Air Force (CNAF) is responsible for the strontium-90 (Sr-90) in the In-Flight Blade Inspection Systems (IBIS) and americium-241 (Am-241) contained within the Electro-Optical Targeting System (EOTS). The NRMP and instructions/directives listed below provide the URSM with mandatory guidance to manage the IBIS and EOTS program. A URSM shall be qualified and designated within each Marine Aviation Logistics Squadron, HMH Squadron (CH/MH-53), and VMFA Squadron (F-35 only) that have an IBIS or EOTS associated with their aircraft. The RSO and ARSO contact info are listed below.

      (1) IBIS: NRMP No. 04-57025-T2NP

      (2) IBIS: COMNAVAIRFORINST 5104.2

      (3) EOTS: NRMP No. 04-57025-T1NP

      (4) EOTS: COMNAVAIRPAC/COMNAVAIRLANT INST 5104.2A

         (a) POC Info (both permits share RSO and ARSO):

         (b) RSO Phone: (619) 545-1436 ARSO Phone: (619) 545-4955

   b. Marine Corps Logistics Command (MARCORLOGCOM) is responsible for the nickel-63 (Ni-63) within the various chemical agent detectors (see the permit listed below for all assets). The NRMP and LOGCOM orders shall be utilized by the URSM to manage the safety program for various Ni-63 assets. Units possessing equipment containing Ni-63 shall have a qualified and designated URSM. Users of this equipment must have knowledge as stated in the LOGCOM order associated with the NRMP. The RSO and ARSO contact info are listed below.

      (1) NRMP 10-67004-T1NP

      (2) MARCORLOGCOM Order (LCO) 5104.1

      (3) MARCORLOGCOM Order (LCO) 5104.2

      (4) POC Info:

(a) RSO Phone: (229) 639-7670

(b) ARSO Phone: (229) 639-7146

(c) Item Managers Phone: (229) 639-8275/6739

c. MARCORLOGCOM maintains a permit for tritium (H-3) sighting assets. These assets are listed in the NRMP listed below. The NRMP and LOGCOM orders listed below shall be used by the URSM to manage the safety program for the various H-3 assets. Armories which manage permitted H-3 sighting assets shall have a qualified and designated URSM. If an armory has multiple cages one URSM is sufficient but the individual cages shall have a qualified and designated RPA. Units without items specified in the below permit are not required to abide by this requirement. Repairable Issue Points (RIP) shall have a qualified and designated URSM as well. Personnel who stock, store and issue permitted items containing H-3 will have user knowledge appropriate to their position. Other areas which maintain permitted items in any capacity shall have a qualified and designated URSM. These areas will also ensure handlers of the items have appropriate hazardous awareness knowledge. The RSO, ARSO, and Item Managers contact info are listed below.

(1) NRMP 10-67004-T2NP

(2) MARCORLOGCOM Order (LCO) 5104.1

(3) MARCORLOGCOM Order (LCO) 5104.2

(4) POC Info:

(a) RSO Phone: (229) 639-7670

(b) ARSO Phone: (229) 639-9478

(c) Item Manager's Phone: (229) 639-8275/6739

d. MARCORLOGCOM maintains a permit for depleted uranium (DU) on the USMC M1A1 and M1A2 tanks. Units maintaining M1A1 and M1A2 tanks shall have a qualified and designated URSM. The NRMP and LOGCOM orders shall be utilized by the URSM to manage the safety program for the various DU assets. The RSO, ARSO, and Item Managers contact info are listed below.

(1) NRMP 10-67004-T3NP

(2) MARCORLOGCOM Order (LCO) 5104.1

(3) MARCORLOGCOM Order (LCO) 5104.2

(4) POC Info:

(a) RSO Phone: (229) 639-7670

(b) ARSO Phone: (229) 639-7146

(c) Item Manager's Phone: (229) 639-8275/6739

e. Marine Corps Systems Command (MARCORSYSCOM) is responsible for DU ammunition within the Marine Corps. The RSO and ARSO's contact info are listed below and both fall within the PM Ammo division of MARCORSYSCOM. For deployed units a CRSM shall be qualified and designated to support all DU ammunition. As DU shall never be stocked within the Continental United States (CONUS), there is no need for assigning RSMs to support on CONUS installations. The following NRMP, instructions/directives, and POC information provide the RSM with mandatory guidance and assistance in managing the DU ammunition safety program.

(1) NRMP No. 45-67854-L1NP (pending)

(2) MCO 5104.2

(3) POC info:

(a) RSO Phone: (703) 432-8784

(b) ARSO Phone (703) 432-8938

2. When a command obtains a generally licensed radioactive asset, not under an NRMP, a URSM shall be trained, designated and assigned to support the asset per reference (a) as the Generally Licensed Material Officer (GLMO). A URSM/GLMO is not required if there is a local RSO, who can take responsibility for the asset (new device and RSO fall under the same command). All requirements (see reference (a)) for the generally licensed asset shall be identified and included in a local SOP.

APPENDIX C

LETTER OF DESIGNATION

From: *Commanding General/ Commanding Officer (as appropriate)*

To: (*Insert appointee name here*)

Subj: APPOINTMENT AS A(N) (ASSISTANT) RADIATION SAFETY OFFICER

Ref:

(a) NAVMC DIR 5100.8 MARCOR OSH Program Manual

(b) MCO 5100.29C-V7 Marine Corps Radiation Safety Program

(c) NAVSEA S0420-AA-RAD-010, Radiological Affairs Support Program (RASP) Manual (NOTAL)

1. Per references (a) through (c), you are appointed as a (*n*) (*Assistant*) RSO.

2. This appointment does not constitute a replacement appointment or serve as a cancellation of the RSO appointment of any other individual. (*For replacements utilize: This appointment constitutes a replacement appointment and serves as a cancellation of the RSO appointment of* (*insert outgoing RSO name here*))

3. You are directed to familiarize yourself with references (a) through (c) as well as the permit conditions and ensure strict adherence to the same as they will guide you in the execution of your duties and responsibilities.

4. You will keep the chain of command informed of problems encountered in the execution of your duties. Further, you have direct access to the Commander, CO, or OIC on matters dealing with the RASP and have independent authority to stop any RASP operation he/she considers to be unsafe.

5. This appointment shall remain in effect until your reassignment, transfer, or is rescinded by proper authority.

(*Printed name*)

APPOINTMENT ACKNOWLEDGMENT

From: (*Appointee name*)

To: *Commanding General/ Commanding Officer (as appropriate)*

Subj: APPOINTMENT AS (ASSISTANT) RADIATION SAFETY OFFICER

1. I have read and understand references (a) through (c) as well as the permit conditions pertaining to this billet.

2. I hereby assume the duties and responsibilities of this billet.

(*Printed name*)

Copy To:

CMC (SD)

LETTER OF DESIGNATION

From: *Commanding Officer*

To: (*Insert appointee name here*)

Subj: APPOINTMENT AS RADIATION SAFETY MANAGER (RSM)

Ref: (a) NAVMC DIR 5100.8

(b) MCO 5100.29

1. Per references (a) and (b), you are appointed as a (*Insert Major Command, Command, Installation, or Unit)* RSM.

2. This appointment does not constitute a replacement appointment or serve as a cancellation of the RSM appointment of any other individual. (*For replacements utilize: This appointment constitutes a replacement appointment and serves as a cancellation of the RSM appointment of* (*insert outgoing RSM name here*))

3. You are directed to familiarize yourself with references (a) and (b) and ensure strict adherence to the same as they will guide you in the execution of your duties and responsibilities.

4. You will keep the Chief of Staff informed of problems encountered in the execution of your duties.

5. This appointment shall remain in effect until your reassignment, transfer, or is rescinded by proper authority.

(*Printed name*)

APPOINTMENT ACKNOWLEDGMENT

From: (*Appointee name)*

To: *Commanding Officer*

Subj: APPOINTMENT AS RSM

1. I have read and understand references (a) and (b) pertaining to this billet.

2. I hereby assume the duties and responsibilities of this billet.

(*Printed name*)

Copy To: Apply guidance on pages 2-5 through 2-6 in determining whom to copy for MCRSM, CRSM, IRSM, or URSM

LETTER OF DESIGNATION

From: *Officer-In-Charge*

To: (*Insert appointee name here*)

Subj: APPOINTMENT AS RADIATION PROTECTION ASSISTANT (RPA)

Ref: (a) NAVMC DIR 5100.8

(b) MCO 5100.29

1. Per references (a) and (b), you are appointed as a Radiation Protection Assistant.

2. This appointment does not constitute a replacement appointment or serve as a cancellation of the RPA appointment of any other individual. (*For replacements utilize: This appointment constitutes a replacement appointment and serves as a cancellation of the RPA appointment of* (*insert outgoing RPA name here*))

3. You are directed to familiarize yourself with references (a) and (b) and ensure strict adherence to the same as they will guide you in the execution of your duties and responsibilities.

4. You will keep the Radiation Safety Manager informed of problems encountered in the execution of your duties.

5. This appointment shall remain in effect until your reassignment, transfer, or is rescinded by proper authority.

(*Printed name*)

APPOINTMENT ACKNOWLEDGMENT

From: (*Appointee name)*

To: *Officer-In-Charge*

Subj: APPOINTMENT AS RPA

3. I have read and understand references (a) and (b) pertaining to this billet.

4. I hereby assume the duties and responsibilities of this billet.

(*Printed name*)

Copy To: Apply guidance on pages 2-5 through 2-6 in determining whom to copy.