

Dear Radioactive Material Licensees,

The Illinois Emergency Management Agency's (IEMA) Bureau of Radiation Safety wishes to remind all licensees to verify that service providers working at your facility are appropriately licensed for the operations they have been hired to complete. Those services may include installation, maintenance, repair, relocation or removal of radioactive gauges, calibration of radiation detection equipment, servicing of medical equipment used to measure radioactivity, analysis of leak test samples, decontamination and decommissioning services or waste management services such as packaging and preparing containers for shipment.

Service providers must not be contracted to work independently at your facility unless the proposed services fall within the service provider's licensed authorizations. Even when working under their own license, service providers in most circumstances still fall under the client's rules for maintaining control of radioactive material and security while service is being performed. They must also comply with requirements for safety including access restrictions and postings. Several resources are available to determine if service providers are capable of working within the scope of the client's license or if work must be performed under their own license. Licensees should consult one or more of the following before engaging a service provider:

- a. The Sealed Source and Device Registration (if sources/devices involved);
- b. The client's license, personnel and licensee documentation;
- c. The service provider's license, personnel and licensee documentation;
- d. The equipment manufacturer's technical/assembly manual or user's manual;
and,
- e. IEMA, an Agreement State or NRC Regulatory Authorities depending on the service provider's jurisdiction.

For sources and devices, the installation, initial radiation monitoring, decontamination, relocation, removal from service, maintenance and repair of devices containing radioactive material and installation, replacement and disposal of sealed sources containing radioactive material used in devices can generally only be performed by the manufacturer or by other persons specifically authorized by the Agency, an Agreement State, or the U.S. Nuclear Regulatory Commission to perform such services. That license must specifically address authorization for operations at temporary jobsites. A specific license amendment is required for any client licensee wishing to perform these services.

When transferring radioactive waste or radioactive sources, it is the licensee's responsibility to verify that the intended recipient is authorized to receive the radioactive waste or sources prior to making any shipment. The radioactive waste must be packaged by persons specifically authorized by the Agency, an Agreement State, or the U.S. Nuclear Regulatory Commission to perform such services and must be packaged in approved containers for shipment. Additional restrictions regarding size, weight, activity, radioisotopes and other waste characteristics may also apply. Couriers may only accept packages of hazardous material for transport that have been properly prepared in accordance with US DoT requirements. Hazardous material carriers are not authorized for packaging or preparation services prior to transport unless they have a separate license for these services. Please be aware that while the waste broker/service provider may provide packaging and transportation services, the client licensee (i.e., waste generator) is ultimately responsible for ensuring compliance with all applicable regulatory disposal requirements including documentation for receipt/acceptance of waste shipments at a licensed waste disposal facility.

If you have any questions about the status of service providers or authorizations allowed under your radioactive materials license, please contact Gary Forsee, Inspection and Enforcement Supervisor, for further information at (217) 785-9929.

Please visit the nuclear safety section of the Agency's website at <https://www2.illinois.gov/iema/NRS/RadSafety/> for the latest information concerning the Agency's radiation safety programs. The Agency supports the US NRC in its emphasis of the critical importance of an active and positive safety culture. Our website contains this and other important information such as new and proposed requirements, guidance, events and other items of interest.