



# Guidelines for establishment of Radiotherapy Centre

Smriti Sharma Atomic Energy Regulatory Board Government of India

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# **Need of Regulation**

#### Why regulation?

• As ionizing radiation is hazardous in nature, a suitable control measures must be in place to ensure minimum radiation exposure so that maximum benefits are derived with minimum radiological risk i.e. use of ionising radiation does not cause undue risk to the health of people and the environment.

# Responsible organization for enforcing the rules & regulation?

# Atomic Energy Regulatory Board(AERB)

- AERB established in 1983 under the Atomic Energy Act, 1962
- Regulatory and safety functions envisaged under sections 16, 17 and 23 of the Atomic Energy Act
  - Control of Radioactive Substances
  - Radiation Safety in Nuclear and Radiation facilities
  - Industrial Safety in Department of Atomic Energy
    - (DAE) installations

#### **Mission of AERB**



To ensure that the use of ionizing radiation and nuclear energy in India does not cause undue risk to the health of people and the environment.

**Chairman,** Atomic Energy Regulatory Board is the Competent Authority to enforce the rules & regulations framed under the Atomic Energy Act, 1962 for radiation safety in the country.

# Structure of the legal framework



AERB has issued more than 160 regulatory documents for Nuclear and radiation facility

# **Organisational Structure (AERB)**

Board	Secretariat
• Chairman : Chairman AERB	8 technical Directorates /Divisions
• Ex-officio Member : Chairman SARCOP	1 Safety Research Institute
• External Members : 4 (experts from outside Dept. of Atomic Energy)	Three Regional Centres
	<ul> <li>Southern (Chennai),</li> <li>Eastern (Kolkata) &amp;</li> </ul>

• Secretary: AERB Official

> Northern (New Delhi)

#### **Functions of AERB**

**Development of Safety Documents** 

Safety Review and Issue of License/Authorisation to Nuclear and Radiation Facilities

Verify compliance with the stipulated requirements by the nuclear and radiation facilities

**Regulatory Inspections** 

Safety Research

Licensing of Key Operating Personnel

**Review of Emergency Preparedness** 

**Public Information** 

# **Regulated Installations**

#### Nuclear and Fuel Cycle Facilities

- Nuclear Power Plants and Research Reactors
- Uranium Mines and Mills
- Beach Sand Minerals
- Fuel Fabrication Plants
- Reprocessing Plants
- Waste Management Facilities
- R&D Facilities

#### Radiation Facilities/Activities

- Medical Applications of Ionisation Radiation
- Industrial Radiography
- Nucleonic Control System
   / Nucleonic Gauges
- Radiation Processing Facilities
- Accelerators and Cyclotron Facilities
- Radioactive Sources in R&D
- Transport of Radioactive Material

# **Regulated Radiation Facilities**







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	Agriculture	

Radiotherapy Installations	-465
Industrial Radiography Installations	- 549
Gamma Radiation Processing Facilities	5 - 21
Gamma Irradiation Chambers	- 114
Medical cyclotrons	- 18
Nuclear Medicine Centers	- 301
Medical X-ray	- 42481
Institutions using Nucleonic Control System/Nucleonic gauges	- 482

Manufacturer of consumer products & Scanning Facilities -23

# **Radiotherapy facilities in India**

Radiotherapy Centers	: 465	
Teletherapy Facilities		
> Telecobalt Units	: 206	
Linear Accelerators	: 446	
Gamma Knife	: 7	
Tomotherapy	: 12	
> Cyberknife	: 6	
Brachytherapy Facilities		
Remote Afterloading Units (HDR/MDR/LDR)	: 300	
<ul> <li>Ocular brachytherapy</li> </ul>	: 05	
> IORT	: 03	
Radiotherapy Simulator (Standard)	147	

As on September, 2018

# How the Radiation Safety is ensured?

# **Radiation Safety is ensured**

#### • Built-in Safety

- Room planning from radiation safety stand point
- Equipment to meet desired standards & specification (Type approval/NOC for the equipment)

#### Operational Safety

- Licensing requirement
  - Qualified staff
  - PMS
  - Measuring & Monitoring instruments
- Periodic maintenance & QA of the equipment
- Source inventory and periodic radiation survey
- Annual status report on safety
- Periodic Regulatory Inspection
- Formulating procedures for emergency situation
- Reporting off-normal situations to AERB promptly
- Servicing and maintenance of the equipment by the AERB authorized agency

# Responsibilities assigned as per RPR-2004

- Employer
- Licensee
- RSO
- Radiation worker

# How the Radiation Facilities are regulated?



#### AERB e-Governance Project (e-LORA) [<u>e-Licensing Of Radiation Applications</u>]

- e-LORA is launched for achieving more efficiency, reliability and transparency in regulation.
- Feature of e-LORA

a-LORA

Apart from online consenting/licensing, e-LORA is used to achieve:

Tracking of radiation sources i.e. "cradle to grave"

Reporting & reviewing unusual occurrence

Inspection and enforcement and thereafter compliance

#### e-LORA

- For obtaining requisite regulatory clearance, user need to submit relevant application through AERB's e-Governance application - eLORA (e-Licensing of Radiation Applications) System
- To access eLORA system, employer need to register his/her institute for obtaining login credentials (user Id & Password).
- Institute Registration





# **Regulatory stages in e-LORA system**

- Institute Registration
- Site and Layout Approval
- RSO approval
- Permission for procurement of Equipment
- Permission for procurement of radioactive source(s)
- ERI/SRI
- SSA (For equipment housing radioactive sources such as telecobalt & RAL brachytherapy unit)
- Source transfer report
- Commissioning permission (after updating Staff, PMS,M & M instruments, QA tool etc.)
- Radiation survey
- Licence for operation (attaching QA details)
- Consent for decommissioning

Note: All the Radiation Professionals must obtain RP registration No. through eLORA

# **Institute Registration**

- Guidelines for institute registration is provided on e-LORA (AERB website www.aerb.gov.in and click on 'eLORA'.)
- Institute registration application along with following documents;
  - Employer's proof of Identity and Date of Birth
  - Address proof (registered documentary evidence from govt. or local authority ) for the Institution
  - Document substantiating employership of the institute. *Example: (i) Appointment Letter, (ii) Board Resolution, etc.*

Hospital name and address mentioned in the application should be of actual radiotherapy site address

# **Radiation Professional Registration**

Guidelines for Radiation professional registration is provided on e-LORA (AERB website www.aerb.gov.in and click on 'eLORA'.)

Major points to be noticed (specific to registration as Radiation Oncologist):

- Applicant name mentioned in the application should exactly match with at least one of the supporting document
- Proof of identity and Date of Birth
- Basic qualification (MBBS) and Professional qualification passing certificate from university to be enclosed.

#### **Regulatory stages for Linear Accelerator** installation in eLORA

Steps	Purpose	Regulatory Form Name		
First time Licence				
Step 1.	Obtaining site and layout approval	Application for Site and Layout Approval		
Step 2.	Obtaining RSO approval	Nominate RSO		
Step 3.	Obtaining procurement permission of equipment	Application for Procurement (Equipment/Source)		
Step 4.	Intimating receipt of equipment	Equipment Receipt Intimation		
Step 5.	Obtaining commissioning approval of equipment (i.e. prior permission for switching ON beam)	Application for Commissioning		
Step 6.	Submission of radiation survey levels measured around the installation	Survey Report		
Step 7.	Obtaining licence for operation of equipment	Application for Licence		
Decommissioning				
Step 1.	Obtaining consent for decommissioning	Application for Decommissioning and Disposal		
Step 2.	Obtaining transport permission of Depleted Uranium (DU), if applicable	Transport of Un-registered Source		
Step 3.	Intimating decommissioning of equipment	Intimation for Decommissioning		
Step 4.	Intimating disposal of Depleted Uranium (DU), if applicable	Intimation of Export/Transport/Disposal		

# Site and Layout Approval

Site and layout application along with drawings of site plan on ground floor, main layout and cross-sections along breadth, length and through maze.

Major points to be consider while preparing for radiotherapy layout drawings:

- The location of the radiotherapy installation should be so chosen that it is away from unconnected facilities and is close to the related facilities such as Simulator Room, Mould Room etc.
- Specify nature and type of occupancy around the radiotherapy room
- In case of multiple installations (e.g. two medical accelerator installations, etc.), show the proposed individual installation completely and other adjoining installation(s) partially.
- Legend for each type of material (brick, concrete etc.) and its density should be provided
- Primary barrier width on either side of central beam axis in case of Teletherapy installation.
- Source position and bed position in case of Brachytherapy installation





NOT TO SCALE : All dimensions are in Centimeter

SECTION Z-Z

# Site and Layout Approval contd..

- Control console should be placed adjacent to the entry to treatment room door i.e. interlocked door, so that the interlocked door is under direct supervision from the control console and there is no barrier (not even glass partition) in between the interlocked door and control console.
- Drawings should be in conjunction with each other
- Owner's plot boundary to be indicated in the site plan
- All facilities at the vicinity of 20 m from the external walls of radiotherapy room should be shown in the site layout plan.
- If radiotherapy room is to be constructed in the basement and natural earth is to be used as a shielding material, declaration regarding THICKNESS of the Earth and it's LEVEL to be maintained forever in owner's property should be clearly mentioned.
- Name of institute and address of institute ('Permanent Address' of institute as seen in eLORA account) should be mentioned on all the drawing.

Once site and layout plan approved by AERB, RT installation shall be constructed as per AERB approved layout plan

#### **Procurement permission**

- Permission shall be obtained from AERB to procure any radiation source/equipment. Equipment may be either based on NOC or TA
- Required staff- RSO shall be available, No other staff required
- Requisite M&M instrument- Proposed/available

### **Commissioning permission**

Permission shall be obtained from AERB to commission radiation source/equipment- i.e. permission for beam ON

- Requisite Qualified staff
  - Minimum required Radiation Oncologist, Medical Physicist, Radiotherapy Technologist, Radiological Safety Officer shall be available
- Personnel Monitoring Services (PMS)
  - All Radiation workers must be provided with Personnel Monitoring Badges (TLD badge)
- Requisite M&M instrument-available
- QA tools, Safety tools- available

After commissioning approval- Radiation survey data of all around the installation need to be submitted

#### License for operation

Permission shall be obtained from AERB prior to operation

 Performance test report of the radiotherapy equipment must be carried out as per prescribed QA documents of AERB & Acceptance test Criteria

### **Replacement of decayed source**

- Performance of the unit is satisfactory
- Authorization is to obtained from AERB for procurement of fresh source
- Replacement of the source is done by trained and certified engineer under supervision of RSO (Authorized for Source Transfer Supervision by AERB)
- Report on source transfer is to be sent to AERB
- Performance tests is carried out and approval obtained from AERB for restarting treatment

### **Disposal of disused sources**

- Unused sources in public domain are potential risk
- Must be sent back to the original supplier of the source/authorised waste disposal agency for safe disposal
- No source is transported without approval of AERB
- Regulatory requirements are to be complied during transport (such as labeling, marking, documentation and emergency response)

# Decommissioning of Radiotherapy equipment

Consent for decommissioning/disposal of radiotherapy equipment/sources shall be submitted to AERB along with following document:

- Acceptance from supplier to carry out decommissioning of radiotherapy equipment. It should be carried out by the trained and certified service engineer and authorized agency
- Concurrence from disposal agency for acceptance of disused source (for equipment containing radioactive source e.g. telecobalt)

After decommissioning consent,

• Source supervision authorisation for supervision of source transfer operation in radiotherapy equipment (for Telecobalt unit) shall be obtained from AERB

### **Regulatory Inspection(RI) of Radiation Facilities**

#### • Objective:

"To ensure that the activities performed by the Consentee during all stages of consenting process are in compliance with the laid down safety requirements stipulated in Regulatory and Statutory documents".

### **Regulatory Inspection**

AERB has published following documents for Regulatory Inspection and initiating enforcement actions:

- AERB Safety Guide entitled "Regulatory Inspection and Enforcement in Nuclear and Radiation Facilities" (AERB/SG/G-4)
- Safety Manual entitled "Regulatory Inspection And Enforcement in Radiation Facilities"- AERB Safety Manual No. AERB/RF/SM/G-3

## **Type of Inspections**

- Announced/Planned inspection
- Unannounced/Surprise inspection
- Special inspections

Number of regulatory inspection carried out last year was around 700 radiation facility.

Who has the right or the obligation to conduct RI? -----Authorized Persons By the Competent Authority

Non compliances are brought to the notice of the institution and they shall comply with the requirements

## **Frequency of regulatory inspections**

- Potential for significant exposure, categorisation of sources
- Non-submission of periodic safety status report
- Possessing disused sources
- Reported unusual occurrences
- Past experience on regulatory compliance with safety requirements

# Challenges faced in Control of Radiation Sources

- Lack of commitment from the management to ensure safe use of radiation sources
- Lack of safety culture
- Lack of awareness regarding their duties and responsibilities under AE(RP)R, 2004 by the employer/licensee/RSO
- Lack of effective radiation protection infrastructure
- Financial constraints in disposal of disused source by employer
- Insufficient training of personnel in the safe handling of radiation sources
- Non-existence of comprehensive quality audit program
- Non-reporting of radiation incidences
- Higher patient load per machine

#### Conclusion

- There exists an effective regulatory framework for governing control over radiation sources/equipment used in medicine
- High standard of radiation safety is ensured through inherent built-in safety features incorporated in the design (Type Approval) & operational and administrative controls at the installation
- Joint efforts by all the stakeholders (AERB, Supplier/Manufacturer and end user) are required for obtaining maximum benefits of radiation while minimizing the risks
- It must be ensure that institute has all the requisite approvals from AERB prior to undertake the installation/decommissioning/transport etc. for meeting safety objective
- The prime onus of ensuring the overall radiation safety, security and safe handling of sources rests with the employer/licensee and its personnel.
- Expeditious review of applications and transparency is assured by AERB
- After deployment of eLORA, almost all the stakeholders can make their offices paperless(electronic storage of documents)

#### **Conclusion contd..**

Radiation Safety Culture is within every radiation worker's own responsibility, NOT IMPOSED or DO it Because some one wants.

