



Radiation Safety FAQ – Students and Clinical Training

1. Are students considered occupational radiation workers?

Yes. Students participating in clinical rotations involving exposure to radiation **as a necessary feature of assigned duties** while under the supervision of a facility staff member are considered **occupationally exposed individuals**. They are subject to occupational dose limits under **RCSA §§ 19-24-2, 19-24-6, and 10 CFR part 20 as incorporated by RCSA § 22a-153-1** consistent with [NRC interpretation \(10 CFR § 20.1003\)](#).

2. Do students need dosimeters?

Yes, if a student is expected to receive occupational dose limit during their clinical rotation. The **facility owner is responsible** for providing appropriate dosimetry, even if the educational institution issues the badge. Alternately, the facility can conduct a **prospective** analysis demonstrating students are **unlikely** to receive:

- **More than 25%** of the applicable limit in RCSA § 19-24-5 for students (such as those in a radiological technologist program) that receive occupational dose **only from radiation generating equipment**.
- **More than 10%** of the applicable limit in 10 CFR 20 subpart C as incorporated by RCSA § 22a-153-1 for students (such as those in a nuclear medicine technologist program) that receive occupational dose **from radioactive materials or a combination of radioactive materials and radiation generating equipment**.

The facility may accept an analysis performed by an educational institution, but it **must** evaluate radiation from the sources of ionizing radiation **at the facility**.

3. Can educational institutions provide dosimetry for students?

Yes. Schools may provide dosimeters and maintain cumulative dose records, but the **facility retains regulatory responsibility** for ensuring monitoring is adequate, records are maintained, and occupational dose limits are not exceeded.

4. Who maintains the radiation dose records?

The **facility owner** is responsible for maintaining records of occupational exposures for all individuals under their supervision, including students. If the school provides dosimetry, the facility should have a documented agreement (e.g., MOU) describing responsibilities for recordkeeping and reporting.

5. What should a facility do if a student receives an unexpected or high dose?

Facilities must investigate any abnormal dose readings and, if required, report the event to the DEEP Radiation Division under **RCSA § 19-24-11 and 10 CFR part 20 subpart M as incorporated by RCSA § 22a-153-1**. The facility must also take corrective actions to prevent future overexposures.

6. Are volunteers and interns treated the same as students?

Yes. Any non-compensated individual (such as fellows or volunteers) performing **assigned duties** that involve exposure to radiation **as a necessary feature of those duties** is considered occupationally exposed.

7. What are DEEP inspectors looking for during inspections?

Inspectors verify that **facilities**:

- Ensure student safety and compliance with facility radiation protocols
 - Ensure dosimetry is provided for students and trainees or demonstrate through prospective analysis that they are not expected to receive a significant percentage (see question 2) of the occupational dose limit.
 - Have documented arrangements with educational institutions if they provide dosimetry
 - Maintain accurate exposure records
 - Investigate abnormal doses
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8. Who can I contact for guidance?

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