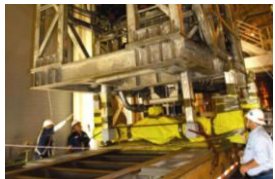
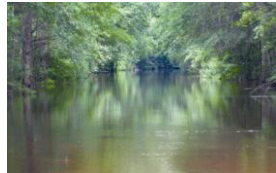




Beryllium Issues and EFCOG



Steven Jahn
Washington Savannah River Company
EFCOG Meeting

May 2, 2007

- **Regulatory Authority within 10 CFR 850 now enforceable under 10 CFR 851.**
- **Implementation too subjective**
- **Common set of areas of disagreement**

Defining Problems

- **“Potential Exposure” is number one issue, since all decisions for a program of managing exposure flow from it.**
- **10 CFR 850 implies airborne risk, but DOE seeks to manage all risk with beryllium**
- **Auditing community seeks more conservative program (ALARA for Rad)**
- **Fundamental research on health effects lacking**

Benchmarking

- **Exposure**
- **Engineering controls vs. Potential Exposure**
- **Source definition**
- **Wipe sampling and censored data**
- **Air sampling with competing radiological risk**
- **Posting and Labeling**
- **Medical Surveillance**

Benchmarking Findings

- **Y-12, LANL, LLNL, Pantex, AMWTP (Idaho)**
- **No definition of potential**
- **No documentation of declined participation**
- **Worker population determinations all different**
- **Postings all meet regulatory minimum, but widely differ thereafter**
- **No ability to demonstrate beryllium compliance within radiological settings except Y-12 (uranium) and SRS (tritium and plutonium)**

How to Proceed?

- **Revisit the Technical Standard languishing in RevCom (BHSC already has started this)**
- **Subcommittee consider technical papers from member companies in the interim (radiological equivalency for monitoring, for example)**
- **Propose EFCOG adopt position of BHSC and carry forward**
- **Request EFCOG provide Beryllium insight to DNFSB, EM and OA organizations**