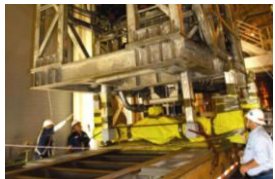
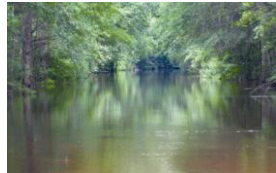




RAD VERSUS NONRAD CONTROLS



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Issue - Rad versus nonrad activities are often controlled differently

– Rad activities controlled ALARA

- Often treated as having no threshold
- Skin contact typically unacceptable
- Inhalation often infers job was out of control

– Nonrad activities generally controlled ALAP

- Threshold based
- Skin contact minimized but often acceptable
- Inhalation minimized but accepted for many chemicals

Impact of This Reality

- **Rad controls take precedence in mixed environments**
- **Benefit**
 - Rad controls often address nonrad chemicals
- **Disadvantage**
 - Conflicts that do arise in day-to-day operations may create confusion and less than ideal controls

Examples of Hazards

- Radiological Hazards
 - Radiation (alpha, beta, gamma, neutron)
 - Contamination on surfaces and in the air
 - Tritium
- Industrial Hygiene Hazards
 - Chemicals - aerosols, gases & vapors, fibers
 - Heat stress (big deal in South Carolina)
 - Noise
- Industrial Safety Hazards
 - Slips & falls
 - Falling objects
 - Confined spaces

Examples of Where Conflicts Arise

- **Respirators for potential – particularly for transuranics**
 - Limits visibility
 - Introduces tripping hazards
- **PPE used to prevent skin contamination**
 - Increases heat stress
 - Introduces air loss hazard
 - Impact use of hearing protection
- **Exposure increased by competing controls**
 - Work may be slowed by respiratory protection use
 - Heat stress controls (air movement) may increase hazard

Desired Work Planning Steps

- **Identify scope (determine hazards)**
- **Plan controls to mitigate hazards**
- **Consider new hazards from controls**
- **Verify best overall plan is implemented
(Integrated Safety Management)**

Current Approach

- **Only occasionally do controls for IH and Rad hazards conflict – resolution in RWP**
- **Segregation of organizations and planning process inhibit integration**
- **Late planning inhibits the use of engineered control**
- **Even if well planned - worker maybe confused**
- **Worker sometimes forced to integrate controls during work**
- **Segregation promotes assumptions**

New Approach Being Piloted

- **All controls recorded in work instructions**
 - Promotes selection of best approach from competing controls
 - Clarifies requirements for worker
 - Avoids delays during work
 - Minimizes assumptions about when to apply controls
 - Forces recognition and resolution of conflicts
 - Avoids the hazards associated with work delays

Changes Needed to Support New Approach

- **More effort needed to create the plan**
 - **Better walkdowns prior to planning**
 - **More dialog between safety professionals**
- **Well written document**
 - **Steps in logical order**
 - **No other document required**
 - **PPE clearly identified**
 - **No superfluous information**
 - **Use of picture to identify location and radiological conditions**

Early Pilot Results

- **Workers love it**
- **IH and Rad Protection are adjusting**
- **Planners are afraid**
- **Facilities are resisting**