

EFCOG ES&H Steering Committee

March 3, 2008

A meeting of the EFCOG ES&H Steering Committee was held in room GH-019 of the Forrestal Building from 1300-1730 on 3/3/08. Attached is a summary of the items that may be of interest to the Radcon Subgroup members:

1. Jim Stafford provided a status of six Radcon activities that are being tracked by the Steering Committee.

Four of the six were closed out in the meeting, and include:

- a. RP/2008/01 - Assist DOE/HQ in setting up 10CFR835 Workshop. Workshop held 11/27-11/29/07.
- b. RP/2008/02 - Work with Nuclear Energy Institute (NEI) on Radcon manpower issues. Greg Perkins attended the NEI meeting in July 2007, and presented report at November 2007 EFCOG Workshop.
- c. RP/2008/03 - Replace RPSG Chairman. Jim Stafford replaced Greg Perkins at the November 2007 EFCOG meeting. Greg agreed to act as co-chair to assist in planning the March 2008 meeting.
- d. RP/2008/04 - Assist DOE/HQ in development of guidance for controlling Pu-241. Task team developed at the November EFCOG meeting.

Two items remain open, and are being tracked as follows:

- e. RP/2008/05 - Provide recommendations for improved consistency of neutron quality factors. Task team chartered at November 2007 EFCOG meeting, status report given at March 2008 EFCOG meeting on 3/4/08.
- f. RP/2008/06 - Develop technical justification and recommend documentation for Pu-241 management. Task team chartered at November 2007 EFCOG meeting, status report given at March 2008 EFCOG meeting on 3/4/08.

2. Each ES&H Subgroup Chair was asked to document two best practices.

3. Discussion was held on timing and location of semiannual EFCOG ES&H meetings. As a general policy, we try to have all six Subgroups meet at the same time, but it is difficult, especially in times of reduced travel budgets. Many Subgroups try to "piggyback" onto existing professional society meetings to minimize travel costs and time away from the office which makes it problematic to get all Subgroups together. For the Fall 2008 EFCOG meeting, the group agreed to meet in the west or midwest US in the October or early November time frame, with three sites being considered - Las Vegas, Salt Lake City, or Chicago. If any Radcon Subgroup members have a strong preference, please notify Jim Stafford.

4. For future Spring meetings, we will probably meet in DC in conjunction with the Chemical Safety workshop as we did this time, because several of the Subgroups have strong ties to this annual conference.

Radiation Protection Subgroup March 4, 2008

A meeting of the Radiation Protection Subgroup was held in the Forrestal Building from 0900-1600 on 3/4/08. Attendees included:

- Jim Stafford, Savannah River Site
- Sandy Hyman, Idaho Cleanup Project
- Joe DeMers, Washington Closure Hanford
- Judson Kenoyer, Dade Moeller & Associates
- Kathleen L. Shingleton, Lawrence Livermore National Laboratory
- Shawna L. Eisele, Los Alamos National Laboratory
- Ken Crase, Savannah River Site
- Michael Gilles, Savannah River Site
- Sheri Minnick, Argonne National Laboratory
- Doug McBride, National Security Technologies (NTS)
- Gary Zeman, Argonne National Laboratory
- Ted Giltz, Fluor Hanford
- Greg Perkins, Fluor Hanford
- Jerry Hiatt, Bartlett Services
- Mark Ledoux, Energy Solutions
- Brian Oldfield, Fluor Hanford
- Dan Burnfield, DNFSB Staff
- Ross Miller, Sandia National Laboratory
- Bobby Oliver, B&W Y-12 (Oak Ridge)
- Peter O'Connell, DOE/HS-11
- Joel Rabovsky, DOE/HS-11

See attached agenda.

1. Impact of New Federal Security Badge Process and GERT Training Access – see slides.
2. DOE O 5400.5 Status Update from Working Group – see slides.
3. RadCon Group Task Team Report: Neutron Quality Factors – see slides.
 - See RP/2008/05 above. Sub-action: Ken Crase to deliver EFCOG technical position paper.
4. RadCon Group Task Team Report: Pu-241 Monitoring Issues
 - Three sub-actions to close action RP/2008/06.
 - Team to deliver model exemption request to EFCOG
 - Team to deliver model for authorized limit request to EFCOG.
 - Team to work with DOE-HSS to produce a technical position paper for exemptions and authorized limits for Pu-241.
5. Hard to Detect Radionuclide Status Update – see slides titled “Authorized Limits” Request Update.
6. 10 CFR 835 Exemption Request Status – see attached table “10 CFR 835 Exemption Decision Status”
 - Peter O'Connell, DOE-HSS discussed that when a change in contractor at a site occurs, exemptions to 10 CFR 835 have to be re-submitted and re-approved by DOE. Same for authorized limits in accordance with DOE O 5400.5

7. RadCon Engineer and Pipeline Training Report and Group Discussion – see slides “Status of Radiation Protection Educational Programs”
 - General discussion is that several EFCOG members are involved in different aspects of Education Outreach efforts.
 - Jerry Hiatt, Bartlett Services, provided the following three web sites for additional information:
 - Center for Energy Workforce Development
 - <http://www.getintoenergy.com>
 - North America Young Generation in Nuclear (www.na-ygn.org)
 - Doug McBride, NST, requested copies of “fully exportable” material from Linn State and University of Missouri. Jim Stafford to provide.
 - Sherri Minnick, ANL, mentioned that the NRC now has 2-year associate fellowships and NRC may pay back student loans.
 - Peter O’Connell clarified that the DOE HP fellowships no longer exist, but that DOE Waste Management fellowships are still being awarded.
8. Integrating Radiological Controls into Work Planning - General discussion was held by EFCOG members. No follow-up actions.

Radiation Protection Subgroup March 5, 2008

A meeting of the Radiation Protection Subgroup was held in the Forrestal Building from 0900-1200 on 3/5/08.

1. Per direction from EFCOG ES&H Steering Committee on 3/3/08, each subgroup was requested to document two good practices from EFCOG. Per discussion, following are three good practices for the Radiation Protection Subgroup:
 - Promotion of consistency across EFCOG with the use of technical position papers and models for issues that is common to all or most of the EFCOG members. For example, the products of the two task teams currently working the Pu-241 issue and the need for a model for an exemption to 10 CFR 835 or an authorized limit for use with DOE O 5400.5 and resolution of the neutron quality factor issue (see RP/2008/05 and RP/2008/06).
 - Use of emails for collecting complex wide information from EFCOG members on hot issues/topics on an as needed basis. Discussion was that normally EFCOG members respond quickly, allowing for use by the requestor in a timely manner.
 - Consistent and consolidated approach for Education Outreach efforts. Specifically, sharing of approaches, training materials, and EFCOG members participating on various Academic Boards for local colleges/universities in planning for future Health Physicists and RCTs/HPTs.
2. Jim Stafford discussed the possible locations and timing of the next EFCOG Radiation Protection Subgroup meeting. Timing is expected to be late October/early November and input from members selected Las Vegas as a preferred location.
3. Training Survey Follow-up Discussion on RWT Proficiency
 - Ted Giltz from Fluor Hanford reported that 8 EFCOG members responded to his request. Almost all of the respondents are following core standard material. No one is allowing reciprocity for another site's RWT or use of old cardboard "RWT" cards. Some members allow for challenge exams vs. attendance for the entire length of classes.
 - Peter O'Connell from DOE Office of Worker Safety and Health Policy added that Dan Burnfield from DNFSB has an issue with some of the contractors not requiring practical factors as a part of requalification for RWT.
 - Sandy Hyman from ICP and Jim Stafford from SRS both commented that reviews of RadCon issues/events at their sites did not reflect a need for reinstating the practical factors as a part of requalification for RWT. Stafford commented that when the requirement for practical factors was discontinued, SRS claimed a significant cost savings.
 - Joe DeMers of Washington Closure Hanford commented that they still required practical factors as a part of RWT requalification, but that they were considering removing it as a requirement. Washington Closure Hanford requires supervisors to observe field performance of their employees as a part of the RWT requalification process.
 - Peter O'Connell questioned the members as to their expected responses if the Guide (or the RCS) was revised to "strongly recommend" practical factors as a part of RWT requalification. Most members responded that if directed by their respective DOE field offices, they would follow their contracting processes and request reimbursement, if allowed.
 - Kathy Shingleton of LLNL questioned other members as to the incorporation of the RCS in the company's contracts. No other members responded "Yes". For the members present at the discussion, LLNL appears to be the only site with the RCS as a contract requirement.

4. Termination Bioassays, “DOE Site”, and NADs

Termination Bioassays – see slides.

- Sandy Hyman of ICP presented information regarding recent “find” of legacy approach to obtaining a termination bioassay sample from employees and requested discussion on how other sites handled similar issues.
- Ted Glitz of Fluor Hanford discussed a four pronged approach: routine verbal and written communication with employee, letter via regular mail, registered letter to the employee, final registered letter which includes a dose estimates (based on best available data) and dose letter to employee.
- Jim Stafford of SRS stated that SRS would issue a registered letter to the employee if a terminating bioassay sample was not received.
- Kathy Shingleton of LLNL commented “demanding” a bioassay sample from an employee was considered illegal search and seizure.
- Ken Crase of SRS recommended that the protocol be added to the site’s TBM and procedures.

“DOE Site” – see slides.

- Sandy Hyman of ICP requested feedback on definition of “DOE site” as pertaining to 10 CFR 835.405(e) and crossing public highways.
- Ken Crase of SRS commented that the DOE-SR lawyers interpreted a transport leaving the DOE site when it crossed a public highway.
- Ted Giltz of Fluor Hanford commented that the definition of the site at Hanford was inclusive of the public highways crossing the Hanford site.
- Peter O’Connell commented that the intent of the wording of the new 835 was to include public highways traversing the DOE site as part of the DOE site. Peter committed to adding the clarification to the Guide.

NADs – see slides.

- Sandy Hyman of ICP requested feedback on the requirement for NADs at the different sites.
- In addition to the benchmarking data already provided, Kathy Shingleton of LLNL stated that LLNL also required NADs when there was a Criticality Accident System.
- Peter O’Connell commented that a recent question to Joel Rabowsky was answered that if there was enough fissile material for a criticality event to be “credible” (i.e., 1E-6), then NADs were required, regardless of the criticality safety measures put into place.
- Sandy provided the information and references, as well as benchmarking data for the complex, and requested that DOE-HSS provide additional feedback.

5. RadCon Emergency Preparedness Enhancements – see slides.

6. Additional General Discussion

- Buffer Areas
 - Gary Zeman, ANL, requested feedback from other EFCOG members on whether or not posting an RBA relieves the contractor of PAAA screenings. Varied responses from different EFCOG members. Peter O’Connell, DOE-HSS, to look at the issue and respond via ESH& “response link”, and to consider expanding

the verbage in the Guide. Per follow-up e:mail from Peter O'Connell, the response line is: <http://www.hss.energy.gov/HealthSafety/WSHP/il/>

- DOE O 420.2B (Accelerators)
 - Kathy Shingleton, LLNL, discussed that she has received direction to implement DOE O 420.2B for RGDs that were actually exempted from the order. No other EFCOG member was receiving similar direction from their DOE field offices.
- ISOLO
 - Joe DeMers, Washington Closure Hanford, requested feedback from other EFCOG members on their use/experience with the Canberra ISOLO bench top counters. Testing of the instrument has indicated that the ISOLO can over strip Uranium spectra, thereby under-reporting calculated dpm and activity values, at least for initial counts. He also commented that the 24-hour counts look very promising.
 - Doug McBride, NST, commented that Rob Hayes of the Remote Services Lab had performed a lot of testing and would send information to Joe DeMers and Sandy Hyman.
- RME as M&TE?
 - Peter O'Connell, HSS, requested feedback as to the handling of Radiation Monitoring Equipment as M&TE. General discussion is that none of the attending EFCOG members treat RME as M&TE. Joe De Mers commented that to do so is in contradiction to some of the ANSI requirements.
 - Sandy Hyman provided Peter O'Connell with two SME names/phone numbers from ICP to contact for additional information.
- New dose methodology
 - Gary Zeman, ANL, requested feedback from EFCOG members regarding implementation of IMBA and the new dose methodology. He commented that some of his doses are lower than with the ICRP-30 dose methodology runs. General feedback was that most doses are lower, just a few are higher. Gary recommended that EFCOG may want to consider adding this topic to the next EFCOG agenda and bring dosimetry experts for further discussion.
 - Sandy Hyman commented that there were two DOE documents available that discuss "gaps" and other information with regards to implementing IMBA. She would forward to Gary for his review.