

ORPS Revisions

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ORPS Revision Summary

- **ORPS Group 6 Criteria: a “hot topic” in EFCOG/RP for many years**
- **DOE M 231.1-2 *Occurrence Reporting and Processing of Operations Information* recently revised**
 - Multiple inputs from Contractors, including “EFCOG Consensus” from last meeting
 - High-level final negotiations within DOE & NNSA
- **DOE O 232.2 *Occurrence Reporting and Processing of Operations Information*, issued 8/30/11, effective 1/1/12 (or when incorporated into Contracts)**
- **O 232.2 incorporated changes**
 - Portions of “EFCOG Consensus” input
 - Additional comments from within DOE
 - References to DOE O 458.1 *Radiation Protection of the Public and the Environment*, issued 6/6/11

Final Version

Group 6, Subgroup A: Loss of Control of RAM

- Criteria apply to bulk RAM, RSS, property containing RAM, discovered legacy RAM
- 1) * Offsite RAM > authorized applicable limits in O458.1 ~~or > 1x 835~~
~~Appendix E~~
- 2) Loss or unexpected discovery of RAM > 100x 835 Appendix E (excluding consumer products if handled iaw manufacturer's instructions) or loss of accountability for >24 hrs
 - 24 hrs starts at discovery & includes 1 business day
 - ~~Unexpected = outside areas routinely controlled for radiological purposes~~
- 3) Loss or unexpected discovery of RAM > 1x 835 Appendix E or loss of accountability for >24 hrs
- Legacy RAM can be reported in quarterly short form report

6B: Spread of Radioactive Contamination

- 1) * Offsite contamination > 1x authorized limits or > 1x total values in 835 Appendix D (~~1x removable tritium values~~)
 - may be operational emergency under Group 1 Criterion 1
- 2) Onsite contamination >100x 835 Appendix D excluding footnote 3, outside the following:
 - areas routinely posted and controlled for contamination
 - areas controlled per 835.1102(c)
 - non-posted areas under observation & control
 - also exempt: authorized limits, legacy contam., ~~DOT-controlled~~
 - explanation of RBA exclusion
 - may be operational emergency...
- 3) Onsite contamination >10x 835 Appendix D excluding footnote 3
- 4) Onsite legacy contamination > 10x 835 Appendix D excluding footnote 3
 - Legacy RAM can be reported in quarterly short form report

6C: Radiation Exposure

- 1) Dose > limit in 835 or 458.1
- 2) No monitoring for dose > thresholds in 835.402(a) or (c)
- 3) Single occupational dose **attributable to an identified event** that exceeds an expected dose by 500 mrem CED or **the greater of 10% or 100 mrem ED** from external exposure
- 4) Radiological releases per O458.1 or 40CFR61.92
 - For all of Subgroup C, reportability should be determined promptly following an event, using field indicators when dosimetry results are not available. Quantitative results should only be reported using the site's established dosimetry, dose assessment, and modeling processes. Resulting confirmed dose estimates may overturn initial reportability determinations.

6D: Personnel Contamination

1) Offsite medical assistance for contaminated personnel

- Transport to offsite facility, contaminated **personnel or clothing** > 1x 835 Appendix D **total values**
- Offsite medical personnel brought onsite for response

2) Offsite personnel / clothing contamination > 1x 835 Appendix D (tritium 1x removable value)

3) ~~Unplanned~~ onsite personnel / clothing contamination (excluding **anti-Cs provided for radiological protection**) > 10x 835 Appendix D (~~tritium 10X removable value~~) n/a for tritium

Conclusions

- **Some relief in reporting**
 - Excepted: areas routinely controlled and monitored for contamination
 - Excepted: areas under continual observation and control
 - Short form report for legacy issues
 - Unexpected exposures attributable to an identified event
- **Some clarifying language rejected – confusing language remains**
- **Some new reporting challenges**
 - Unexpected discovery of RAM
 - Coordination with operational emergencies
 - Excluding footnote 3 for contamination reporting
 - Coordination with environmental releases
- **Fruitful collaboration and contribution from EFCOG/RP**