



Radiation Protection Policy Activities

Peter O'Connell, CHP

**Office of Health and Safety
U.S. Department of Energy**

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Policy Updates



April 11, 2011 amendment 10 CFR 835

**-Corrects submersion dose DACs in
Appendix C**

-Published Q&A on amendment:

http://www.hss.doe.gov/healthsafety/wshp/radiation/docs/rpp_questions.pdf



Regulatory Agenda



Fall 2011 extended a project to amend 10 CFR 835 to the Regulatory Agenda. The purpose of this amendment will be to:

- Modify Appendix D of 10 CFR 835 “Surface Contamination Values.” (still waiting on update to tables in O 458.1)**
- Advised that likely not able to move tables from 835 into our guide.**



Exemption Decisions



Portsmouth GDP - January 31, 2011, USEC Inc request to ORO to expand USEC Inc exemption to American Centrifuge Operating, LLC (ACO)

ACO - a new wholly owned subsidiary for which USEC Inc has requested DOE approval to become the sub-lease holder for D&D

DOE determined that the proper approach is for ACO to submit a request for exemption to 10 CFR 835.



Radiological Control Technical Position Papers (RCTP)



Nothing new

<http://www.hss.doe.gov/HealthSafety/WSHP/radiation/tpp.html>

Working with GC on need for a NRC license for work not on federal owned or controlled property



ORPS



DOE O 232.2

Approved August 30, 2011
Effective January 1, 2012

Major changes:

Legacy radioactive material discovered through a routine radiological monitoring program may be summarized in a single short form report, for example, on a quarterly basis.

Identification of onsite radioactive contamination, exclusive of footnote 3 to Appendix D, and that is found outside areas routinely posted, controlled and monitored for contamination.



ORPS 2



Discovery of onsite radioactive contamination greater than 10 times and no greater than 100 times the total contamination values does not apply to packages monitored in accordance with 10 CFR Section 835.405 that meet DOT contamination limits.



ORPS 3



Subgroup C Radiation Exposure

[Note: For all of Subgroup C, reportability should be determined promptly following an event, using field indicators when dosimetry results are not available. Quantitative dose estimates should only be reported using the site's established dosimetry, dose assessment, and modeling processes. Resulting confirmed dose estimates may overturn initial reportability determinations.]



ORPS 4



Subgroup D Personnel Contamination

(1) *2 Any occurrence requiring offsite medical assistance for contaminated personnel, including transporting a person with personnel or clothing contamination due to DOE operations/activities that exceeds 1 times the total contamination values in 10 CFR 835, Appendix D to an offsite medical facility or bringing offsite medical personnel onsite to perform treatment or decontamination.



Accident Investigation Order O 225.1B March 4, 2011



Loss of Control of Radioactive Material

Any confirmed monitoring result (workplace or individual) indicating an intake (via inhalation, ingestion, wound or absorption) of radioactive material by a general employee equivalent to 2 or more times the annual limit on intake (ALI).



Accident Investigation Order

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Notes

- (ii) Confirmation must be made within 3 working days following identification of monitoring results (workplace or individual monitoring) indicating an exposure exceeding one or more of the criteria in this section.
- (iii) Monitoring results are those obtained prior to medical intervention to reduce or otherwise mitigate dose.



Accident Investigation Order

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Notes

(vi) “Confirmed” means a monitoring result confirmed by follow-up radiobioassay, by association with a known incident, or by investigation.



Update on NRC activities regarding adoption of ICRP 103 eye dose limits



- **August 30, 2011, NRC published Federal Register request for comments.**
- **Consolidating DOE comments, comments to DOE were due end of September.**
- **Comments to NRC due October 31.**



ES&H Reporting O 231.1B



- Issued June 27, 2011
- Areas:
 - Annual Site Environmental Report
 - Illness/Injury/Fire Protection
 - REMS
 - Safety Basis Information
 - Sealed Sources



Other policy related items



- SRS leaking tritium exit lights
- Y-12 DOT definitions
- SRS area of smears