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RECORD #50

TITLE: Guidance - Use of NRC Form 4 - Lising of Exposure Periods

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10 CFR 20.102  
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GUIDANCE - USE OF NRC FORM 4 - LISTING OF EXPOSURE PERIODS

PURPOSE - To provide guidance on the use of the Form 4 with respect to listing periods of exposure at different licensee's facilities while employed by another single employer who is not necessarily a licensee.

BACKGROUND - The Westinghouse in-service inspection division inquired about the listing of periods of exposure on NRC Form 4 for radiation work conducted at many power plant facilities while employed only by Westinghouse. Westinghouse maintains their own Form 4's, recording the highest exposure received for each plant where work was conducted by comparing the facility badge results with their own. One power plant licensee required a record of each period of exposure for each of the other facilities where in-service work was performed. This would have resulted in several pages for each Form 4 since as many as 30 or more facilities would be involved every 6 months per man. Instead, Westinghouse requested that they be permitted to continue to add the cumulative exposures for each place where work was conducted and take the result to the facilities as one total exposure to be used as one entry for the Form 4.

DISCUSSION - On August 8, 1978 the views of OELD were requested on whether item 5 on the Form 4, "name and address of employer" means each employer or each separate location where an exposure occurred.

In a written opinion, ELD [Jim Lieberman] stated that the term "employer" means just that. Thus, only one entry on the Forms 4 is necessary for the exposures received during the time period for which the employer did not change.

This view is consistent with the purpose of Form 4 which is to provide a licensee with a history of the individual's exposure. The circumstances of the previous exposures, i.e., numerous small exposures, a few large exposures, location, etc., is irrelevant information to the licensee as such information is not necessary for the determination of the accumulated dose. 10 CFR 20.101(b).