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WM 9100298

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NOTE TO: Kevin Ramsey, Radiation Safety Officer
Division of Industrial and Medical Nuclear Safety

FROM: John J. Linehan, Acting Director
Repository Licensing and Quality Assurance Project Directorate
Division of High-Level Waste Management

SUBJECT: COMMENTS ON NMSS POLICY FOR RADIATION PROTECTION

We have reviewed the draft "NMSS Policy and Procedures Letter 1-42," and offer the following comments on the Letter:

- (1) Under the section on "Basic Requirements," the phrase "Because MC 0524 requirements parallel the requirements of Part 20" is misleading. It is our understanding that MC 0524 has not been revised to conform with revisions to 10 CFR Part 20. The Federal Register Notice for the recent revisions to Part 20 (56 FR 23360, May 21, 1991) states that "this regulation becomes effective on (30 days after publication in the Federal Register). However, licensees may defer implementation of this rule until January 1, 1993." We believe the letter should acknowledge that the manual chapter will have to be revised to conform to Part 20.
- (2) In the "Administrative Limits" section under Basic Requirements, the annual limits for NMSS employees is set at 250 mrem effective dose equivalent for employees not under 18 or pregnant, and 50 mrem for employees under 18 or pregnant. Because this document sets official policy which may be followed for many years to come, we believe that it should include the basis for or rationale for these values.

We have also included a mark-up of the draft Letter with several additional minor comments intended to enhance the clarity of the document. If you have any questions regarding these comments, please contact Robert Neel at X20448.

for (Original) Signed by *[Signature]*
 John J. Linehan, Acting Director
 Repository Licensing and Quality Assurance
 Projects Directorate
 Division of High-Level Waste Management

Enclosure: As stated
cc: Willard B. Brown, NMSS/PMDA

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NMSS Policy and Procedures Letter #1-42
[date]

PURPOSE: To establish procedures and guidance for monitoring NMSS staff exposure to radiation that may be encountered during the performance of official duties.

COVERAGE: This procedure supplements NRC Manual Chapter NRC-0524, Standards for Protection Against Ionizing Radiation, and implements the requirements set forth in the Chapter.

BACKGROUND: The February 16, 1990, revision of NRC Manual Chapter (MC) 0524 established requirements for an Agency-wide employee radiation exposure database and enhanced dose tracking system, required the designation of Radiation Safety Officers at headquarters, required the issuance of radiation monitoring equipment at headquarters, clarified the radiation reporting requirements for NRC employees, and established employee radiation protection training requirements.

POLICY: NMSS employees shall use an NRC dosimeter anytime they visit a licensee site or other site where possession of radioactive materials is authorized and exposure to radioactive materials is possible. Licensee dosimeters should not be used in lieu of an NRC dosimeter unless authorized, but may be used in addition to NRC dosimetry.

PROCEDURES:

Responsibilities and Authorities:

1. NMSS Staff

- a. Shall wear a dosimeter at all times in restricted

areas →

(as defined by Part 20).

- b. Shall conduct themselves in a manner consistent with the requirements of this letter and MC 0524, and ensure that any radiation exposure received while conducting NRC business is maintained as low as reasonably achievable (ALARA).
- c. Shall not exceed administrative dose limits without authorization.
- d. Shall pick up and return dosimeters in accordance with established administrative procedures.
- e. Shall notify the NMSS Radiation Safety Officer (RSO) of any ~~unplanned~~ ^{potential accidental occupational} exposure to radiation or radioactive materials that ~~may~~ ^{might} exceed applicable limits in this letter or MC 0524.
- f. Female employees who choose to declare themselves pregnant shall inform their immediate supervisor and the NMSS RSO in writing before accepting an assignment that could involve exposure to ionizing radiation.

2. Branch Chiefs:

- a. Shall ensure that each employee under their supervision is informed of the requirements of this letter and MC 0524 before assigning them tasks that could expose them to ionizing radiation.
- b. Shall notify the NMSS RSO if any employee under 18 years old or pregnant is exposed to ionizing radiation while conducting NRC business.
- c. Shall obtain the concurrence of the NMSS RSO prior to authorizing employees under their supervision to exceed administrative dose limits.
- d. Shall notify ^{the} NMSS RSO of any licensee dosimetry programs that are found to be unacceptable.
- e. Shall obtain the concurrence of the NMSS RSO prior to authorizing employees under their supervision to use a licensee dosimeter ^{as a substitute for} ~~instead of~~ an NRC

dosimeter.

- f. Shall ensure that each female employee under their supervision is informed about the risk from prenatal radiation exposure (consistent with Regulatory Guide B.13) before assigning them tasks that could expose them to ionizing radiation.
- g. Shall ensure that ^{potential} exposure to licensed sources of radiation and the use of dosimeters are properly indicated on Form 279, "Official Travel Authorization".

3. Radiation Safety Officer (RSO)

- a. ← Shall review dosimetry reports and resolve abnormalities, and notify the emp^{ly}ee and their branch chief if their reported exposure exceeds the administrative limit.
- b. Shall evaluate and process requests to exceed dose limits.
- c. Shall report any overexposure in accordance with MC 0524.
- d. Shall provide technical assistance to NMSS employees
- e. Shall respond to requests for exposure history and provide reports to employees
- f. Shall maintain a hard copy file of monthly dosimetry reports for NMSS employees

BASIC REQUIREMENTS:

General: Although NMSS does not possess radioactive sources under its direct control, NMSS employees may be occupationally exposed to radiation while conducting NRC business. NMSS licensees are legally responsible to limit the exposure of workers (including visitors) to radioactive material in their possession in accordance with 10 CFR Part 20. Because MC 0524 requirements parallel the requirements of Part 20, NMSS will generally rely on licensee

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(and will be revised to conform to revisions to Part 20)

programs while complying with MC 0524. NMSS will not normally require independent radiation surveys at licensed facilities. NMSS personnel will comply with all facility radiation protection procedures and instructions during site visits.

Administrative Limits

- Rationale needed.*
- a. annual limit for NMSS employees shall be 250 mrem whole body effective dose equivalent (EDE). *TEDE (?)*
 - b. special annual limit for employees under age 18 shall be 50 mrem whole body EDE. *TEDE (?)*
 - c. special annual limit for declared pregnant employees shall be 50 mrem whole body EDE for the duration of the pregnancy.

Training:

Training which meets the intent of 10 CFR Part 19 is required by MC 0524 before NMSS employees are issued an NRC dosimeter, unless the employee will be escorted by someone with equivalent training. The NMSS Radiation Worker Training Course has been developed in conjunction with the Technical Training Center (TTC) to provide this training. The class will be offered periodically, and a training manual will be issued prior to the class. Employees with appropriate health physics training may "challenge" the written test without attending the lecture, with the approval of their immediate supervisor. [↑]Passing the written test shall satisfy the training requirement for a period of two years.

Respiratory Protection and Bioassays:

Under normal circumstances, NMSS personnel do not enter areas where they may be exposed to airborne radioactivity. If all of the requirements of the licensee's respiratory protection program are met (i.e., medical exam, special training, and proper fit test), NMSS personnel may use licensee-supplied respiratory protection equipment to limit the intake of airborne radioactivity. When necessary or desirable, to aid in determining an employee's intake of radioactive materials, NMSS shall arrange for bioassay

services at the National Institute^S_A of Health (NIH) or other —
qualified medical facility.