DRAFT FOR DISCUSSION

Control of Access to High Radiation Areas

(Draft to support discussions at an NRC public meeting on 2/25/2004)

Recent experience with NRC inspections, as well as discussions between licensees and NRC staff in public meetings, has revealed a possible need for clarification of some requirements and guidance for the control of access to high radiation areas.[1]

Specific requirements and guidance that may require clarification include the following:

1. The licensee shall ensure that each entrance or access point to a high radiation area has one or more of the following features … Entryways that are locked, except during periods when access to the areas is required, with positive control over each individual entry (from 10 CFR 20. 1601).

2. Each entryway to [a high radiation area] shall be conspicuously posted as a high radiation area and shall be provided with a locked or continuously guarded door or gate that prevents unauthorized entry (from Standard Technical Specifications, Administrative Controls).

3. Physical barriers surrounding high radiation areas should be sufficient to prevent inadvertent entry (e.g., a 2 meter [6-foot] fence, with worker training and signs or procedures to deter climbing, may be adequate for controlling access to a high radiation area) (from Regulatory Guide 8.38).

4. Openings in physical barriers around a high radiation area are not required to be controlled as entrances if exceptional measures are needed to access them. Examples of areas that that do not need to be controlled as entrances are the manway to a tank or vessel that has its cover bolted in place or an opening in a shield wall that is physically difficult to access without a ladder or mobile platform (from Regulatory Guide 8.38).

5. [Accessible high radiation areas] that are within large areas where no enclosure exists to enable locking and where no enclosure can reasonably be constructed around the individual area should be barricaded and conspicuously posted (from Regulatory Guide 8.38).

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[1] "High radiation area," as used further in this document, refers solely to areas with dose rates greater than 1.0 rem/hour at 30 centimeters from the radiation source or from any surface penetrated by the radiation, but less than 500 rads/hour at 1 meter from the radiation source or from any surface penetrated by the radiation.