

NAVY RADIATION SAFETY
COMMITTEE

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ORGANIZATIONAL
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MANUAL

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Table of Contents

Chapter I	-	Organization and Responsibilities
I.1		Introduction
I.2		Membership
I.3		Responsibilities
Chapter II	-	Navy Radioactive Material Permits (NRMPs)
II.1		Introduction
II.2		Format
II.3		Conversion
II.4		Requests for Action
II.4.1		New Permits
II.4.2		Amendments
II.4.3		Renewals
II.5		Review
II.6		Preparation and Issuance
II.7		Termination
Chapter III	-	Inspection and Enforcement
III.1		Introduction
III.2		Severity Levels
III.3		Reporting
III.4		Follow-up
III.5		Inspection by NRC
III.6		Enforcement
Chapter IV	-	Communications with NRC
IV.1		Routine
IV.2		Situational
Appendices		
A	-	Navy Radioactive Materials Permit Form
B	-	State Codes for NRMPs
C	-	Use Codes for NRMPs

Chapter II

Navy Radioactive Material Permits (NRMP)

II.1 Introduction

NRMPs are issued (in lieu of a NRC license) by the NRSC to all Navy and Marine Corps activities who receive, possess, distribute, use, transport, transfer or dispose of radioactive material. This includes NRC regulated by-product material, source material, special nuclear material and naturally occurring or accelerator produced material. They are not issued for radioactive materials associated with Navy Nuclear Propulsion or Navy Nuclear Weapons. NRMPs will not be issued for the use of any NRC regulated by-product material in a sealed source or device not listed in the "NRC Registry of Sealed Sources and Devices" without prior concurrence of NRC.

II.2 Format

As shown in Appendix A the format of a NRMP is similar to that of a standard NRC license. The following explains various areas of the permit.

Block 1 - Permittee	Name and official mailing of activity holding permit.
Block 2 - Permit No.	A thirteen character number specific for that activity and use. Key characters are: 1-2 State Codes (App. B) 4-8 UIC 10 Use Code (App. C) 11 Sequence Code 12-13 Identifies as Navy Permit
Block 3 - Amendment No.	
Block 4 - Docket No.	A reference number provided by NRC.
Block 5 - Expiration Date	Usually 5 years from date of issuance.
Block 6 - Radioactive Material	These blocks will list all authorized isotopes, their form, and quantities. This is done for both NRC regulated material and NARM.
Block 7 - Chemical/Physical Form	
Block 8 - Maximum Quantity	
Block 9 - Authorized Use	Gives specific uses authorized for the materials given in Blocks 6-8.
Block 10- Conditions	Gives specific conditions of the permit.

II.3 Conversion

At the time the single broad license is issued all licenses held by Department of the Navy components are effectively cancelled. Each command will then be forwarded a letter informing them of this change and providing their new permit number. This letter is to be filed in the current NRC license file. One copy of this letter will be maintained by the NRSC and one copy forwarded to the NRC. Actual permits will not be issued to a command until it becomes necessary to amend or renew its previous license.

II.4 Requests for Action

II.4.1 New Permits: When a command determines that its mission requires the use of radioactive material it will contact the appropriate Technical Support Center for guidance in submitting its request. All requests will be submitted to the NRSC via the Technical Support Center utilizing the Navy Radioactive Materials Permit Application Form. Information required to complete the Navy permit form will be similar to that required when applying for a NRC license. The appropriate NRC regulatory guide should be consulted.

II.4.2 Amendments: When a command determines it is necessary to change any item listed in its NRMP it shall submit a request for amendment. Such requests shall be submitted utilizing the NRMP application form completing only items 1-4, and those items being changed. This will be forwarded to the NRSC via the appropriate Technical Support Center.

II.4.3 Renewal: A NRMP is normally valid for five (5) years unless the inspection history and/or performance record warrants a decrease in the renewal cycle. Six months prior to expiration of its permit a command should initiate renewal action utilizing Navy Radioactive Materials Permit Application Form. Renewal applications shall be complete without reference to previously submitted documentation, shall identify any parts that are changing, and shall reflect current operating procedures.

NOTE: Renewal applications received at the Technical Support Center prior to expiration date are considered to be "Timely Filed."

II.5 Review

Technical Support Centers will perform a review of any request for action concerning NRMP. This review is for the purpose of assuring compliance with NRC regulations and adequacy of safety measures and personnel training. The review will be conducted in accordance with Navy Regulations. NRC standard review plans may be used as guidelines.

II.6 Preparation and Issuance

After completion of technical review and confirmation that a request meets all applicable requirements, the Technical Support

Center will prepare the NRMP, and forward original and four (4) copies to the Executive Secretary. The Technical Support Center will retain one copy and all supporting documents on file. (NOTE: Any action on a permit will require that it be reissued in its entirety.)

The Executive Secretary will review the completed NRMP and take action as appropriate. In permits involving routine uses of radioactive material the Executive Secretary (with the Chairman's approval) will sign and issue the NRMP. Permits involving non-standard uses of radioactive material, unregistered sealed sources or devices, or other items of concern require approval of the NRSC prior to issuance.

The Executive Secretary will forward the original signed copy to the command requesting the permit. One (1) copy will be sent to the appropriate technical support center, one (1) copy will be maintained in NRSC files, and one (1) copy forwarded to the NRC. For Radiography Permits, one (1) copy will be forwarded to SPCC Mechanicsburg.

II.7 Termination/Suspension

II.7.1 NRMP may be terminated at a permittee's request.

II.7.2 The NRMP may be terminated or suspended by the NRSC as a result of non-compliance with conditions of the permit.

II.7.3 At the time of termination/suspension specific guidance will be provided.

Chapter III Inspection and Enforcement

III.1 Introduction

The purpose of an inspection and enforcement program is to promote and protect the radiological health and safety of not only occupational workers, but also the public and the environment. This is done by ensuring compliance with regulations and license conditions and commands promptly correcting items of non-compliance (violations). Inspections of permit holders will be conducted by the Technical Support Centers. They will include evaluation of the conditions set forth in the NRMP and pertinent Navy Directives. Violation of a Naval regulation will have the same effect as violating a NRC regulation. The frequency of inspections will be consistent with requirements of the NRC.

III.2 Severity Levels

Since regulatory requirements (both Navy and NRC) have varying degrees of safety, safeguards, or environmental significance it is necessary to identify the relative importance of a violation. Each violation will be placed in one of five (5) Severity Levels. Severity Levels I, II, and III are considered to be serious violations and require the greatest action. 10 CFR 2, Appendix C provides examples of the various severity levels.

III.3 Reporting

Reports of inspections will be prepared by the Technical Support Centers identifying each violation by reference and severity level. This report will be forwarded to the NRSC for review and submission to the command involved. The NRSC will advise the DCNO (Logistics) on the status of all violations in Severity Levels I, II, and III.

III.4 Follow-up

Once a violation of any severity level is documented, it is imperative that it be corrected. Commands will be advised in the inspection report that they have sixty (60) days to inform the NRSC via the cognizant technical support center, by letter, of corrective actions taken or proposed with an estimated completion time. Failure to take corrective action may result in termination or suspension of permit. Reinspection of violations in Severity Levels I, II, and III will be conducted within six months from the date of the first inspection.

III.5 Inspections by NRC

On an annual basis, NRC will conduct an inspection of the Navy's Specific License of Broad Scope. This is done to determine

overall Navy compliance with the license. Additionally NRC has retained the right to perform inspections of any Navy permittee either alone or with the assistance of the Technical Support Centers. Reports of any inspections performed by NRC will be provided directly to the NRSC with copies to the appropriate technical center.

III.6 Enforcement

In the case of Severity Level I, II, or III violations, the Executive Secretary will prepare a letter for OP-04 signature to the activity involved stressing the gravity of such violations. They will be required to reply directly to OP-04, with a copy to the cognizant Technical Support Center, within thirty (30) days giving corrective actions planned or taken. These same actions may be taken in cases of continued lesser violations.

The ultimate method of enforcement is to suspend or terminate an activity's NRMP. This will be done only in the severest of cases and after other methods have failed. The decision to suspend or terminate operations must be approved by OP-04.

Chapter IV Communications with NRC

IV.1 Routine

Direct communication with NRC will be conducted only by the Chairman, Navy Radiation Safety Committee, his designated representative, or the Technical Support Centers.

IV.2 Situational

IV.2.1 Voice/Message Report: The following instances require immediate notification:

- o Excessive radiation levels or contamination on packages (10 CFR 20.205)
- o Theft or loss of radioactive material (10 CFR 20.402)
- o Radiation incidents as defined by 10 CFR 20.403
- o Defect or failure to comply (10 CFR 21)
- o Therapy misadministrations (10 CFR 35.33)
- o Reports of leaking sources (10 CFR 34.25 and 10 CFR 35.59)

In the above instances, notification shall be made by OPREP-3 NAVY BLUE Report under OPNAVINST 3100.6 series. NAVSEASYS COM (06GN), COMNAVMEDCOM (21), NAVSEADET RASO, and NAVENVIRHLTHCEN shall be information addresses to the OPREP-3.

IV.2.2 Written Report: The following instances require written notification to OP-45 within 15 days with copies to the appropriate Technical Support Center:

- o Overexposure and excessive levels and concentrations (10 CFR 20.405)
- o Diagnostic misadministrations (10 CFR 35.33)

IV.2.3 Notification of NRC: The above reports shall be in lieu of any notification required by 10 CFR. Notification of the NRC is the sole responsibility of the NRSC.

NAVY RADIOACTIVE MATERIALS PERMIT

Pursuant to the authority stated in OPNAVINST 6470.3, Navy Radiation Safety Committee, and in reliance on statements made by the applicant, permission is hereby granted for the acquisition, receipt, possession, use, storage and disposal of radioactive materials listed below subject to the conditions listed in this permit.

1 - COMMAND	2 - PERMIT NO.
	3 - AMENDMENT NO.
	4 - DOCKET NO.
	5 - EXPIRATION DATE

**6 - RADIOACTIVE
MATERIAL****7 - CHEMICAL /
PHYSICAL FORM****8 - MAXIMUM QUANTITY
AUTHORIZED****UNITED STATES NAVY RADIATION SAFETY COMMITTEE**

OPNAVINST 6470 3

SUPPLEMENTARY SHEET
United States Navy Radiation Safety Committee
Radioactive Materials Permit

PERMIT NO.

AMENDMENT NO.

APPENDIX B
NUCLEAR REGULATORY COMMISSION
STATE CODES

1. Alabama	51. Canal Zone
2. Arizona	52. Puerto Rico
3. Arkansas	53. Hawaii
4. California	54. Canada
5. Colorado	55. Virgin Islands
6. Connecticut	56. Guam
7. Delaware	57. Soma
8. District of Columbia	58. Marshall Islands
9. Florida	59. Navy Ships
10. Georgia	60. Antarctica
11. Idaho	61. Egypt
12. Illinois	62. Indonesia
13. Indiana	63. Okinawa
14. Iowa	64.
15. Kansas	65.
16. Kentucky	66.
17. Louisiana	67.
18. Maine	68.
19. Maryland	69.
20. Massachusetts	70. Azores
21. Michigan	71. Denmark
22. Minnesota	72. United Kingdom
23. Mississippi	73. Germany
24. Missouri	74. Crete
25. Montana	75. Italy
26. Nebraska	76. Netherlands
27. Nevada	77. Spain
28. New Hampshire	78. Turkey
29. New Jersey	79. Greenland
30. New Mexico	80. Japan
31. New York	81. Korea
32. North Carolina	82. Philipines
33. North Dakota	83. Panama
34. Ohio	84. Iceland
35. Oklahoma	85.
36. Oregon	86.
37. Pennsylvania	87.
38. Rhode Island	88.
39. South Carolina	89.
40. South Dakota	90.
41. Tennessee	91.
42. Texas	92.
43. Utah	93.
44. Vermont	94.
45. Virginia	95.
46. Washington	96.
47. West Virginia	97.
48. Wisconsin	98.
49. Wyoming	99.
50. Alaska	

APPENDIX C

Use Code

The following codes are to be used as the tenth character of a permit number to designate us of material.

MEDICAL COMMANDS:

- | | |
|-------------------------------------|---------------------------|
| 1 Nuclear Medicine (Limited Scope) | 6 Navy Drug Screening Lab |
| 2 Nuclear Medicine (Broad Scope) | 7 Gas Chromatographs |
| 3 Teletherapy | 8 SNM Less than 200 Grams |
| 4 Research (Non-human Use) | 9 Other |
| 5 Irradiators (Less than 10,000 Ci) | |

ALL OTHER COMMANDS:

- | | |
|---|--|
| A Radiography | M Subcritical Assemblies |
| B General Industrial - Not Otherwise Coded | N RTG Power Sources |
| C Calibrator (Instrument Cal) | P Fixed Gauges |
| D Environmental Applications | Q Irradiators |
| E Type A Broad Scope | R Buried Waste (NEESA) |
| F Type B Broad Scope | S Source Material |
| G Type C Broad Scope | T Radioactive Commodities-
Handling and Storage |
| H SNM - Unsealed less than
Critical Mass | U |
| I Portable Gauges | V |
| J Analytical Measuring Instruments | W |
| K Gas Chromatographs | X |
| L DU Munitions | Y |
| | Z |