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RECORD #17

TITLE: Temporary Job Sites for Radiography Operations

FICHE: 68579-234

INTERPRETIVE GUIDE

SUBJECT: TEMPORARY JOB SITES FOR RADIOGRAPHIC OPERATIONS

A. PURPOSE AND BACKGROUND

To provide guidance clarifying the length of time and definition of temporary Job sites for radiographic operations.

B. APPLICABILITY

The guidance applies to all radiography licensees for which their licenses permits the use of radiographic devices at temporary job sites.

C. EXPLANATION

1. The term "temporary job sites" as referenced in various conditions of NRC licenses authorizes licensees to conduct radiographic operations at locations other than at the address specifically described in the license. Generally, specific locations are not described in the license which means that "permanent" locations are also within the definition of a temporary job site. For example, the addressee listed on the licensee may perform no radiographic operations at the listed address but can maintain sites anywhere, permanent or not. Permanent is defined as a shielded facility in which radiography is conducted within the facility. Field operations is defined as a job site where radiography is conducted outside the facility or office such as at a construction site. However, both permanent facilities and field operations are all considered temporary job sites.
2. The main intent of this license condition is to provide some flexibility to licensees in their activities and permit them to conduct radiographic operations without first obtaining amendments to their respective licenses. The term was never meant to limit radiographic operations at any location for given lengths of time or for time periods of short duration. Additionally, the term was never meant to preclude the radiographic use or storage of byproduct material at permanent structures or installations. A licensee could therefore be in compliance with the "temporary job site" concept if it worked for an extended period of time (possibly numbering in years) at a permanent or field installation such as his license address, a shipyard or

at another company's facility. Conversely, a licensee would be in noncompliance with the license only if it moved its authorized place of business (specified in the license) to another location without first obtaining NRC approval.

3. It may, on occasion, be to the licensee's advantage to request a specific license amendment authorizing radiography operations at a named permanent location since procedures for field radiography are usually more restrictive than for operations at a permanently installed structure. However, as long as the radiography license permits "temporary job site" use and the licensee follows its operating and emergency procedures and complies fully with all NRC rules and regulations, it may work at any site (under NRC jurisdiction) for any length of time.

D. COORDINATION

This guidance has the concurrence of NMSS (J. Jones).

E. REFERENCES

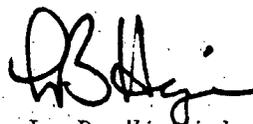
Radiographic license conditions.

F. SUPERSESSION

Interpretations - Temporary Job Sites

G. CONTACT

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