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RECORD #27

TITLE: 10 CFR 20.203(f) Enforcement Guidance for Container Labels

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2406/EO



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
101 MARIETTA ST., N.W., SUITE 3100
ATLANTA, GEORGIA 30303

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SSINS 9193

MEMORANDUM FOR: Radiation Support Section
FROM: A. F. Gibson, Chief, RSS, FF&MS Branch
SUBJECT: 10 CFR 20.203(f) ENFORCEMENT GUIDANCE FOR CONTAINER LABELS

A label required pursuant to 10 CFR 20.203(f) shall bear the radiation caution symbol and the words "CAUTION, RADIOACTIVE MATERIAL" or "DANGER, RADIOACTIVE MATERIAL". It shall also provide sufficient information; as appropriate including radiation levels, kinds of material, estimates of activity, date for which activity is estimated, mass enrichment, etc., to permit individuals handling or using the container, or working in the vicinity thereof, to take precautions to avoid or minimize exposures. There are numerous exceptions allowed by this regulation, but each ensures that the "sufficient information" portion of the requirement is maintained for worker safety.

Discovery of unlabeled containers is almost a certainty at any large facility such as a power plant. If an unlabeled container constitutes an isolated aberrant occurrence as opposed to an overall program deficiency in radioactive materials control, enforcement action may not be appropriate. The regulation goes to great lengths to ensure worker safety by requiring information be available to the individual handling the container, and this is the real point: that worker safety be maintained. Conversely, a very high radiation level container left unlabeled would be a strong indicator of weakness in the licensee's radioactive material control program, as well as being a true radiation safety hazard.

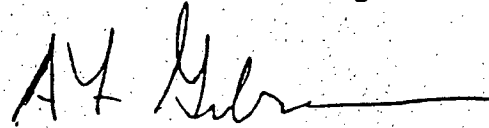
The elements necessary for a good program of control include an aggressive attitude toward the identification of safety hazards associated with containers and expeditious labeling, or application of other control methods. Radiation workers often become complacent in dealing with small quantities of radioactive material and a good program combats this attitude by insisting on vigilance by the Health Physics Staff at every level. The Health Physics Supervisor, as well as technicians, must insist on labeling as a matter of routine.

Should a noncompliance with 10 CFR 20.203(f) be suspected, ensure that control is not being exercised by one of the other methods allowed in paragraph (f)(3) of the section. It may also be appropriate to include in the discussion section of the Inspection Report the calculations you used to determine greater than Appendix C quantities were present in the container.

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It is important to emphasize to the licensee that the purpose of 10 CFR 20.203(f) is to ensure adequate information is available, by whatever appropriate method, to enable a worker to handle radioactive materials safely and to minimize his exposure. A comprehensive and aggressive radioactive material control program is essential to achieve this goal.



Albert F. Gibson, Chief
Radiation Support Section

cc: J. P. Stohr
J. P. Potter
G. R. Jenkins