

210

RECORD #210

TITLE: Hot Spot Interpretation

FICHE:

MAR 08 1990

MEMORANDUM FOR: Ronald R. Bellamy, Chief, EPRPB, DRSS, RI
Douglas M. Collins, Chief, EPRPB, DRSS, RII
L. Robert Greger, Chief, RPB, DRSS, RIII
Blaine Murray, Chief, PRSB, DRSS, RIV
Gregory P. Yuhas, Chief, EPRPB, DRSS, RV

FROM: LeMoine J. Cunningham, Chief
Radiation Protection Branch
Division of Radiation Protection
and Emergency Preparedness
Office of Nuclear Reactor Regulation

SUBJECT: HOT SPOT INTERPRETATION

Recently a resident inspector cited a licensee against their procedures for failure to provide Hot Spot tags that could be identified from both sides as required by those procedures. In the inspection report, Section 20.203(8) that requires radiation areas be conspicuously posted, was used as the bases for requiring Hot Spot tags to be identifiable from both sides.

Although, in this case, we agree the licensee can be cited for not complying with their own procedures, we do not agree with the rational in the inspection report. Hot Spot tags are not required in 20.203 nor are they an acceptable alternative to conspicuously posting radiation areas as required in the regulations. In addition, there is nothing in Part 20 that requires tags and postings to have the same information on both sides. This citation should not be mistaken as an NRC position on Hot Spot posting.

Resident inspectors are reviewing more health physics issues under the current inspection program then they did under the previous inspection program. You may wish to establish a review scheme to ensure that technical positions taken by residents for HP issues are consistent with the regulations and established NRC positions.

If you have any questions regarding our position on this subject, please call Roger Pedersen.

Original signed by LeMoine J. Cunningham

LeMoine J. Cunningham, Chief
Radiation Protection Branch
Division of Radiation Protection
and Emergency Preparedness
Office of Nuclear Reactor Regulation

TECHNICAL CONTACT: Roger Pedersen (492-1079)

cc: M. Knapp, RI
P. Stohr, RII
C. Norelius, RIII
B. Beach, IV
R. Scarano, RV

Distribution:
LCunningham RPB R/F
TEssig Central Files
JWigginton RPedersen
FCongel JWang

C :RPB:DREP:NRB:RPB:DREP:NRB:C:RPB:DREP : : : :
ME :RPedersen :JWigginton :LCunningham : : : :
TE :02/100 :02/100 :02/100