



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

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EGM 81-16

MEMORANDUM FOR: B. H. Grier, Director, Region I
J. P. O'Reilly, Director, Region II
J. G. Keppler, Director, Region III
K. V. Seyfrit, Director, Region IV
R. H. Engelken, Director, Region V

FROM: Dudley Thompson, Director
Enforcement and Investigations, IE

SUBJECT: ENFORCEMENT ACTIONS ARISING FROM RADIATION SURVEYS OF
TRANSPORT VEHICLES

As you know, there have been a few recent cases involving elevated enforcement actions proposed for radiation levels exceeding DOT limits at locations that are, for all practical purposes, inaccessible; e.g., in a 6-inch space between two I beams on the underside of a trailer.

Although DOT regulations do not address the question of accessibility, it is not reasonable to exercise severe enforcement sanctions without applying judgment, such as, when the related hazard is insignificant; that is, unlikely to result in actual exposures under any realistic conditions. Accordingly, please use the following criteria for determining the severity level to be applied in such cases.

When radiation levels under vehicles are found to be only nominally in excess of DOT limits, the violation should be assessed as Severity Level V. When radiation levels between the projected sides or ends of vehicles and the ground; i.e., in more accessible areas; exceed DOT limits, appropriate Severity Levels are to be assigned in accordance with the IEP and EGM 81-14.

The same general policy of applying judgment to the relative real hazard involved should be applied to the determination of severity levels to be assigned to the results of surveys over the tops of vehicles.


Dudley Thompson, Director
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Office of Inspection and Enforcement

See next page for cc's.

185

RECORD #185

TITLE: Enforcement Actions Arising From Radiation Surveys of
Transport Vehicles

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