

U.S. NUCLEAR REGULATORY COMMISSION**Date:** April 12, 2012

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Name of Licensee:

Department of the Navy

Name of Participant(s):Lino Fragoso, Ph.D., Navy Deputy Executive Secretary, NRSC
Raymond K. Lorson, Director RI DNMS
Blake Welling, Chief RI DNMS MSIB
Shawn Seeley, Health Physicist, RI DNMS**Telephone No.**

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Subject:

Applicability of 10 CFR 34.47 requirements to the Navy MML

**(NOTE: This will be used as the
Documents Title in ADAMS)**

We called Dr. Fragoso to speak with him about a recent interpretation from OGC that conflicts with information the Region provided to the Navy in January 2006, regarding 10 CFR 34.47 personal dosimetry requirements. Specifically, OGC reaffirmed that personnel conducting radiography in the field were required to wear a DRD or EPD, an AR, and a personal dosimeter. RI wrote to the Navy in January 2006 that they could utilize an EPD, with a rate alarm feature, in lieu of a DRD and AR.

Blake mentioned that we had spoken with those individuals involved with the 2006 information and were exploring several options. He further mentioned that we were requesting additional information from the Navy before moving forward. Specifically, we were exploring, as one option, the possibility of the Navy requesting an exemption from this regulation (as allowed in 10 CFR 34.111).

The additional information we were requesting included, but not limited to, any information that would differentiate the Navy's radiography program from a non Department of Defense radiography program. Specifically, any information pertaining to

- A: procedural requirements implemented by the Navy such as, use of barrier monitors, number of individuals involved, preparation, procedure usage, and/or work practices;
- B: any challenges encountered with using the EPD's for the past 6 years, such as failure rates or issues encountered during radiography;

We mentioned the exemption option and asked him if he had any questions. Dr. Fragoso acknowledged the issue before us, and was willing to work with us toward an effective resolution.

We thanked him for his time and ended the call at 11:25 am.

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