

- B. Pursuant to the Act and 10 CFR, Part 70, "Special Nuclear Material," to receive, possess, and use at any time special nuclear material as reactor fuel, in accordance with the limitations for storage and amounts required for reactor operation, as described in the final safety analysis, as supplemented and amended;
- C. Pursuant to the Act and 10 CFR Parts 30, 40, and 70, to receive, possess and use at any time any byproduct, source and special nuclear material as sealed neutron sources for reactor startup, sealed sources for reactor instrumentation and radiation monitoring equipment calibration, and as fission detectors in amounts as required;
- D. Pursuant to the Act and 10 CFR Parts 30, 40, and 70, to receive, possess and use in amounts as required, any byproduct, source, or special nuclear material without restriction to chemical or physical form, for sample analysis or instrument calibration, or associated with radioactive apparatus or components;
- E. Delete
- F. Pursuant to the Act and 10 CFR Parts 30 and 70, to possess, but not separate, such byproduct and special nuclear materials as may be produced by the operation of the facility.

Attachment No. 1

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HEALTH PHYSICS PROGRAM1. Materials Safety Program

The program for safe storage, handling, and use of sealed and unsealed special nuclear, source, and byproduct material is based on Radiation Control and Protection Procedures and personnel knowledge. Personnel knowledge is gained through formal training programs and work experience. Radiation Control and Protection Procedures are contained in the Radiation Control and Protection Manual and are supplemented by a plant ALARA program. The Environmental and Radiation Control Supervisor is responsible for both the Radiation Protection program and the ALARA program, with support from Company management.

Procedures are available covering the areas of source accountability, receipt and disposal, leak testing, and radiation surveys. Records are maintained pertaining to these items, as well as storage locations and names of personnel using sources, where applicable.

Training is given to all personnel that work at the H. B. Robinson Unit 2 facility, including training in the following areas:

1. Radioactivity
2. Radiation Exposure Units
3. Radiation/Contamination
4. Maximum Permissible Exposure
5. Personnel Monitoring
6. Respiratory Protection
7. Emergency Plan
8. 10 CFR 19
9. ALARA
10. Pre-natal Exposure

In addition, personnel in the Environmental and Radiation Control group, who maintain surveillance of all radiological parameters and normally handle calibration sources and radioactive samples, are trained in depth in the area of Health Physics. Training consists of basic, intermediate, and advanced series concerning radiological assessment and control.

2. Facilities and Equipment

Facilities include a radiochemistry laboratory and counting room with adequate hoods, hot drains, and instruments for evaluating anticipated radioactive samples and sources. Counting instruments such as a Geli spectrometer, liquid scintillation spectrometer, and proportional counters are available in the counting room.

Sources are used by or under the supervision of authorized individuals with proper training.

3. Personnel Monitoring

The official and permanent record of accumulated external radiation exposure received by individuals is obtained principally from the interpretation of the TLD badge. The direct reading dosimeter provides day-by-day indication of external radiation exposure.

All persons subject to occupational radiation exposure are issued TLD badges and are required to wear such badges at all times while within the plant area. A neutron sensitive dosimeter may be issued to personnel whenever a significant neutron exposure is possible. Personnel who are issued badges pick them up at the access control point on entering the plant and deposit them at the access control point on leaving the plant.

Special or additional badges are issued as may be required under unusual conditions. These devices are issued at the discretion of health physics personnel.

The TLD badges are processed on a routine basis at monthly intervals.

The badge of any individual is processed whenever it appears that an unusual exposure may have occurred.

A self-reading dosimeter is issued, in addition to a TLD badge, to certain individuals whose work conditions make a day-to-day indication of exposure desirable. Dosimeters are read, recorded and re-zeroed regularly. Dosimeter records furnish the exposure data for the administrative control of radiation exposure.

4. Personnel

Implementation of the Radiation Control and Protection program, including special nuclear, source, and byproduct material safety, is under the direction of the Supervisor, Environmental and Radiation Control. This person is assisted by a staff of trained professionals and technicians who are knowledgeable of applicable radiological safety procedures.

Personnel in the Environmental and Radiation Control unit meet the qualifications specified in the FSAR. The Principal Specialist, Health Physics and the Health Physics staff at the corporate headquarters provide technical support to the plant Environmental and Radiation Control group.