

CONVERSATION RECORD
(time) (date)

TIME | DATE
7/2/14

VISIT CONFERENCE TELEPHONE

INCOMING
 OUTGOING

NAME OF PERSON(S) CONTACTED OR IN CONTACT ORGANIZATION (OFFICE, DEPT. ETC.) TELEPHONE NO.
Don Lite ARC 314-991-4545

SUBJECT

C/N 583815 – proposed changes to RPP, and SOP's 16, 29, and 34

SUMMARY

With regard to your May 1, 2014, request to modify ARC's Radiation Protection Program (RPP) and Standard Operating Procedures (SOP) 16, 29, and 34, please address the following:

SOP-29

- Item 1.1: It should not matter where or how pieces of equipment or objects become contaminated. Therefore, please change the first sentence to end after....."on their surfaces."
- In the second sentence, do not delete the word "temporary", or change to "temporary, pending disposal." Deleting "temporary" would allow for indefinite storage in building 200. Further, please also include a definition of "temporary" and include time limits for disposal.
- Item 2.1: The second sentence states that you will "exercise caution so that contamination does not spread." Please include in this item a description of how you will achieve this objective, since now you will be storing surface contaminated objects (SCO) anywhere in building 200.
- Item 3.1: This item was modified to state that if an SCO is to be removed for disposal as non-radioactive waste, it must comply with SOP-30, "Release of Material." However, SOP-30 is specific for Release of Material to vendors. If you want to use the criteria from SOP-30 for item 3.1 of SOP-29, then please copy that criteria and place it in SOP-29, instead of referring to SOP-30, and resubmit SOP-29 for our review.
- Item 3.3: You are proposing to delete specific methods, i.e., magenta and yellow rope, that are used to mark and post areas in building 200 that are used to store SCO, and just require the use of "appropriate signage." Explain why you are proposing to remove the requirement to use magenta and yellow rope to create and maintain a barrier.
- Item 4.0: Based on our July 2 conversation, it is our understanding that you have two types of SCO: 1) items that are not routinely used, or will never be used again and are temporarily stored pending disposal; and 2) items that you need to keep because they will be used again, e.g., tools, building materials, etc. We also understand that items as described in 1) above will be stored exclusively in building 200 and items described in 2) above will be stored in another location that you will describe in a follow-up amendment request.
- It is important that you clearly define what you mean by temporarily storing SCO items in building 200. Please indicate maximum time limits for storage of these items pending disposal. For SCO items that you do not want to dispose of, e.g., tools, etc., which will be stored in another location and not disposed of, you need to clearly describe these types of items and demonstrate that they are needed in order to conduct routine work, maintenance, etc., and the specific location (building/room number) where these items will be stored

Item 5.0: Please include a definition of "timely."

NAME OF PERSON DOCUMENTING CONVERSATION

Kevin Null

SIGNATURE



DATE

7/3/14

ACTION TAKEN

The licensee will address the issues described above and resubmit their request in its entirety. Void this action.

SIGNATURE

TITLE

DATE