

CONVERSATION RECORD  
(time) (date)

TIME | DATE

12/30/14

VISIT     CONFERENCE    TELEPHONE

INCOMING  
 OUTGOING

NAME OF PERSON(S) CONTACTED OR IN CONTACT  
Donald Lite (radsafety@arc-inc.com)

ORGANIZATION (OFFICE, DEPT. ETC.)

TELEPHONE NO.

ARC

314-991-4545

SUBJECT

C/N 584520 – Addition of SOP-44 “Repair or Replace Hood Exhaust System”, and licensee’s 11/14/14 response to our request for additional information dated 9/9/14.

In order for us to complete our review of the new SOP-44, please address the following. Each numbered item below corresponds to the numbered items from the first request for additional information dated 9/9/14.

1. Commit to implementing the current SOP from ARC’s Radiation Protection Program (RPP) for conducting bioassays. Do not make the assumption that if ARC workers, who will be directly supervising contractors, have negative bioassay results then the contractors will be negative, especially when the contractors are handling and cutting ductwork and ARC workers are not directly involved in the cutting activity.
2. You indicated that removal of filtration was previously approved. Please identify documentation (amendment and letter) by which this was previously approved.
3. Please define “direct supervision.” In your 11/14/14 response you stated that the training described in SOP-21 is only given to workers if they need to enter a restricted area, e.g., a laboratory. Please develop a modified training program for this unique situation for the contract workers who will be on the roof cutting ductwork under the direct supervision of ARC employees. At a minimum, the training should discuss potential exposure to radioactive materials, precautions that should be taken, purpose and correct use and removal of PPE, and the purpose of a bioassay.
4. It seems that you are saying that a particular hood where workers are removing and cutting ductwork from will be shut down while the work is being conducted, but the other hoods will be functioning while the workers are on the roof, potentially exposing them to radioactive air effluent. Please expand upon your response to this item, or commit to shutting down the entire air effluent release system while work is being conducted on the roof.
5. In your response to this item you described PPE when removing contaminated ductwork. Please describe PPE that workers will use while cutting ductwork.
10. Same as item 3 above.
12. ARC’s RPP describes procedures for surveying and releasing equipment for unrestricted use. Please identify the relevant procedures and commit to following them for surveying contaminated ductwork for unrestricted release.

NAME OF PERSON DOCUMENTING CONVERSATION

SIGNATURE

DATE

Kevin Null

12/30/14



ACTION TAKEN

Please submit a response within 15 days and reference as additional information to C/N 584520.

SIGNATURE

TITLE

DATE