

## CONVERSATION RECORD

(time) (date)

|TIME |DATE

9/9/14

VISIT

 CONFERENCETELEPHONE  INCOMING  
 OUTGOING

NAME OF PERSON(S) CONTACTED OR IN CONTACT

ORGANIZATION (OFFICE, DEPT.ETC.)

TELEPHONE NO.

Donald Lite

ARC

314-991-4545

## SUBJECT

C/N 584520 – Addition of SOP-44 “Repair or Replace Hood Exhaust System”

In order for us to complete our review of the new SOP-44, please address the following:

1. Improper handling of radiologically contaminated items, e.g., exhaust ductwork, can create cross contamination problems. In particular, cutting of contaminated ductwork can create an airborne hazard and increase the possibility of worker intake of radionuclides. Therefore, describe the bioassay program that will be in place to evaluate the internal dose for any worker who handles and/or cuts contaminated duct work.
2. Submit a current diagram of the exhaust system and identify the areas within the system where the work will be performed. Include a diagram of the proposed revision to the system and identify components that will be replaced, including filtration.
3. In addition to SOP-44, please provide a more detailed description of the work that needs to be performed, the expected length of time to complete the work, and the expected number of contractor employees that will be required to complete the job.
4. Please submit an evaluation of the impact that the repair/replacement project will have on routine licensed operations. We are assuming that in order to protect the contract workers during this project, licensed operations and including fume hoods which remove radioactive air effluent through building 300 ductwork will be suspended temporarily until the project is completed. Please confirm our understanding.
5. Confirm that workers on the project will be issued protective clothing. Describe the protective clothing that workers will be required to wear.
6. Please conduct and submit for our review an evaluation to determine whether or not workers will be assigned respirators, especially for those who will be cutting ductwork.
7. Please describe an air sampling program that will be conducted to evaluate for the presence of airborne radionuclides, or submit justification why one is not needed.
8. The objective of SOP-44 should also include a provision to assure the radiological and occupational safety of the contract workers who will be handling the ductwork.
9. For item 1 of SOP-44, describe the purpose and content of the scoping survey, and include a description of thresholds and associated actions levels.

10. For item 2.1 of SOP-44, confirm that all contactors who are involved with the repair/replacement project, will receive training. Confirm that all contractor employees will conduct work under direct supervision of ARC staff.
  
11. For item 3.1 of SOP-44, what do you mean by the statement that "contract workers under direct supervision receive verbal training?" Is this training different from the training described in item 2.2? From item 2.0, it appears that individuals who cut ductwork are the ones who receive direct supervision. Does this group of individuals then, only receive verbal training?
  
12. For Item 5.0 of SOP-44, describe your protocol for conducting smears of ductwork to determine if the material may be released for unrestricted use.

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NAME OF PERSON DOCUMENTING CONVERSATION	SIGNATURE	DATE
Kevin Null		9/9/14

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ACTION TAKEN  
Please submit a response within 30 days and reference as additional information to C/N 584520.

SIGNATURE	TITLE	DATE
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