





Department of the Interior  
US Geological Survey  
Box 25046, MS-205  
Denver, CO 80225

November 17, 2017

U.S. NRC Region IV  
1600 East Lamar Boulevard  
Arlington TX, 76011-4511

Subject: Radiation Safety Manual for U.S. Geological Survey, License 05-01399-08

Dear Sir or Madame,

During our quarterly meeting on September 6, 2017, the USGS Radiation Safety Committee voted to change the requirement for whole body counts described in our Radiation Safety Manual that was submitted along with our License renewal application in January, 2015. We request that you review the proposed change under C ROLES AND RESPONSIBILITIES Section 3.5 on page II-4. The current language is listed below, followed by the proposed new language.

**2015 language to be removed**

3.5 Whole body counts are required for all radiation workers at the start and end of their tenure on the permit if they are working with applicable forms of radioactive material. Applicable forms include beta and gamma emitting radionuclides in dispersible form. The entry survey is not required for USGS radiation workers who were not previously covered by this policy and did not receive whole body counts at the start of their tenure with a permit. For those workers, a whole body count taken at the end of their tenure with the USGS is required. The Principal Users for each Permit are responsible for ensuring that the whole body counts are performed as required.

**2017 proposed language to be added**

3.5 Whole body counts for radiation workers using beta and gamma emitting radionuclides in dispersible form are not required at the start and end of their tenure on the permit. However, if an individual experiences any incident where internal contamination of any type of radioactive material may be possible, the Radiation Safety Officer and/or Radiation Safety Committee will recommend an appropriate means of evaluating internal exposure via a whole-body count or bioassay, as appropriate for the type of potential exposure. The Principal Users for each Permit, with help from the RSO, are responsible for documenting the incident and recommended action taken, and for ensuring that the recommended course of action is implemented by the exposed worker.

Please contact James Paces, USGS Radiation Safety Committee Chairperson, at 303-236-0533  
jbpaces@usgs.gov or me if you have any questions about this request.

Sincerely,

**CYNTHIA DUFFIELD**

Digitally signed by CYNTHIA DUFFIELD  
DN: c=US, o=U.S. Government, ou=Department of the Interior,  
ou=Geological Survey, cn=CYNTHIA DUFFIELD,  
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