



Conference of Radiation Control Program Directors, Inc.

Office of Executive Director • 205 Capital Avenue • Frankfort, KY 40601
Phone (502) 227-4543 • Fax (502) 227-7362

97 AUG 11 AM 9:06

OSP

August 7, 1997

Paul Lohaus
Nuclear Regulatory Commission
One White Flint North
11555 Rockville Pike
Rockville, MD 20852

Dear Mr. Lohause:

Please find enclosed a finished copy of the latest suggested state regulation from the Conference for Radiation Control Program Directors. **Part Q Licensing and Radiation Safety Requirements for Irradiators** was adopted by the Board of Directors of CRCPD on July 28, 1997. Part Q is will be published for the first time this year.

The CRCPD requests that correspondence relative to Federal Concurrence from your agency be submitted within 60 days of receipt of this correspondence. The CRCPD will treat no response after 60 days as the equivalent of concurrence with this revision.

Thank you for your attention to this important matter.

Sincerely,

Bruce Hirschler
Technical Assistant, SSRCR's

cc: Charles Hardin
Executive Director, CRCPD
Jill Lipoti
Chairman, CRCPD
David Turberville
Chairman, SR-7

A Partnership Dedicated to Radiation Protection

9801220384 980109
PDR STPRG ESQGEN
PDR

PART Q

LICENSING AND RADIATION SAFETY REQUIREMENTS FOR IRRADIATORS

SA# 97007

D - para (a)

Sec. - Q 1 Purpose and Scope

§ 36.1 C - (b) + (c) - quantitative values

- ✓ a. D Part Q contains requirements for the issuance of a license authorizing the use of sealed sources containing radioactive material in irradiators used to irradiate objects or materials using gamma radiation. This part also contains radiation safety requirements for operating irradiators. The requirements of this part are in addition to other requirements of these regulations. In particular, the provisions of Parts A, C, D, and J of these regulations apply to applications and licenses subject to this Part. Nothing in this Part relieves the licensee from complying with other applicable federal, state and local regulations governing the siting, zoning, land use, and building code requirements for industrial facilities.
- ✓ b. C The regulations in this Part apply to panoramic irradiators that have either dry or wet storage of the radioactive sealed sources and to underwater irradiators in which both the source and the product being irradiated are under water. Irradiators whose dose rates exceed 5 grays (500 rads) per hour at 1 meter from the radioactive sealed sources in air or in water, as applicable for the irradiator type, are covered by this part. *same*
- ✓ c. C The regulations in this part do not apply to self-contained dry-source-storage irradiators in which both the source and the area subject to irradiation are contained within a device and are not accessible by personnel, medical radiology or teletherapy; radiography for the irradiation of materials for nondestructive testing purposes; gauging, or open-field, agricultural, irradiations.

Sec. - Q 2 Definitions

- D ✓ "Annually" means at intervals not to exceed one year.
- D ✓ "Doubly encapsulated sealed source" means a sealed source in which the radioactive material is sealed within an inner capsule and that capsule is sealed within an outer capsule.
- C ✓ "Irradiator" means a facility that uses radioactive sealed sources for the irradiation of objects or materials and in which radiation dose rates exceeding 5 grays (500 rads) per hour exist at 1 meter from the sealed radioactive sources in air or water, as applicable for the irradiator type, but does not include irradiators in which both the sealed source and the area subject to irradiation are contained within a device and are not accessible to personnel. *↳ another*
- D ✓ "Irradiator operator" means an individual who has successfully completed the training and testing described in Q.19 and is authorized by the terms of the license to operate the irradiator without a supervisor present.

not defined in Part 36

"Irradiator operator supervisor" means an individual who meets the requirements for an irradiator operator and who physically oversees operation of the irradiator by an individual who is currently receiving training and testing described in Q.19.

D ✓ "Panoramic dry-source-storage irradiator" means an irradiator in which the irradiations occur in air in areas potentially accessible to personnel and in which the sources are stored in shields made of solid materials. The term includes beam-type dry-source-storage irradiators in which only a narrow beam of radiation is produced for performing irradiations.

D ✓ "Panoramic irradiator" means an irradiator in which the irradiations are done in air in areas potentially accessible to personnel. The term includes beam-type irradiators.

D ✓ "Panoramic wet-source-storage irradiator" means an irradiator in which the irradiations occur in air in areas potentially accessible to personnel and in which the sources are stored under water in a storage pool.

D ✓ "Pool irradiator" means any irradiator at which the sources are stored or used in a pool of water including panoramic wet-source-storage irradiators and underwater irradiators.

D ✓ "Product conveyor system" means a system for moving the product to be irradiated to, from, and within the area where irradiation takes place.

D ✓ "Radiation room" means a shielded room in which irradiations take place. Underwater irradiators do not have radiation rooms.

D ✓ *Radiation safety officer* not defined in Part Q

[B] ✓ "Sealed source" means any radioactive material that is used as a source of radiation and is encased in a capsule designed to prevent leakage or escape of the byproduct material.

D ✓ *see § 304*
"Seismic area" means any area where the probability of a horizontal acceleration in rock of more than 0.3 times the acceleration of gravity in 250 years is greater than 10%, as designated by the US Geological Survey.

D ✓ "Underwater irradiator" means an irradiator in which the sources always remain shielded under water and humans do not have access to the sealed sources or the space subject to irradiation without entering the pool.

§ 36.5 Interpretations D § 36.8 info collect. OMB approved D

D Sec. - Q.3 Application for a Specific License § 36.11

- a. Applications for specific licenses shall be filed on a form prescribed by the Agency.
- b. The Agency may at any time after the filing of the original application, and before the expiration of the license, require further statements in order to enable the Agency to determine whether the application should be granted or denied or whether a license should be modified or revoked.
- c. Each application shall be signed by the applicant or licensee or a person duly authorized to act for and on his behalf.

different wording

- d. An application for a license may include a request for a license authorizing one or more activities.
- e. In the application, the applicant may incorporate by reference information contained in previous applications, statements, or reports filed with the Agency provided such references are clear and specific.
- f. Applications and documents submitted to the Agency may be made available for public inspection except that the Agency may withhold any document or part thereof from public inspection if disclosure of its content is not required in the public interest and would adversely affect the interest of a person concerned.

§ 36.13 D, H+S

Sec. Q.4 - Specific Licenses for Irradiators. The Agency will approve an application for a specific license for the use of licensed material in an irradiator if the applicant meets the requirements contained in this section.

- a. The applicant shall satisfy the general requirements specified in Part C of these regulations and the requirements contained in this part.
- b. The application must describe the training provided to irradiator operators including:
 - i. Classroom training;
 - ii. On-the-job or simulator training;
 - iii. Safety reviews;
 - iv. Means employed by the applicant to test each operator's understanding of the Agency's regulations and licensing requirements and the irradiator operating, safety, and emergency procedures; and
 - v. Minimum training and experience of personnel who may provide training.
- c. The application must include an outline of the written operating and emergency procedures listed in Q.20 that describes the radiation safety aspects of the procedures.
- d. The application must describe the organizational structure for managing the irradiator, specifically the radiation safety responsibilities and authorities of the radiation safety officer and those management personnel who have radiation safety responsibilities or authorities. In particular, the application must specify who, within the management structure, has the authority to stop unsafe operations. The application must also describe the training and experience required for the position of radiation safety officer.
- e. The application must include a description of the access control systems required by Q.9., the radiation monitors required by Q.12., the method of detecting leaking sources required by Q.23.,

access control ✓

radiation monitors Q3 ✓

detection of leaking sources ✓

including the sensitivity of the method, and a diagram of the facility that shows the locations of all required interlocks and radiation monitors.

- f. ✓ If the applicant intends to perform leak testing, the applicant shall establish procedures for performing leak testing of dry-source-storage sealed sources and submit a description of these procedures to the Agency. The description must include the:
- i. ✓ Methods of collecting the leak test samples;
 - ii. ✓ Qualifications of the individual who collects the samples;
 - iii. ✓ Instruments to be used, and
 - iv. ✓ Methods of analyzing the samples.
- g. ✓ If licensee personnel are to load or unload sources, the applicant shall describe the qualifications and training of the personnel and the procedures to be used. If the applicant intends to contract for source loading or unloading at its facility, the loading or unloading must be done by a person specifically authorized by the Agency, the Nuclear Regulatory Commission, an Agreement State, or a Licensing State to load or unload irradiator sources.
- h. ✓ The applicant shall describe the inspection and maintenance checks, including the frequency of the checks required by Q.24.

better wording

inspection + maintenance

§ 36.15 D

✓ Sec. Q.5 - Start of Construction. The applicant may not begin construction of a new irradiator prior to the submission to the Agency of both an application for a license for the irradiator and any fee required by the applicable state requirement or statute. As used in this part, the term "construction" includes the construction of any portion of the permanent irradiator structure on the site but does not include: engineering and design work, purchase of a site, site surveys or soil testing, site preparation, site excavation, construction of warehouse or auxiliary structures, and other similar tasks. Any activities undertaken prior to the issuance of a license are entirely at the risk of the applicant and have no bearing on the issuance of a license with respect to the requirements of the appropriate state statute, rules, regulations, and orders issued under the appropriate state statute.

§ 36.17 D

✓ Sec. Q.6 - Applications for Exemptions. Any application for a license or for amendment of a license authorizing use of a teletherapy-type unit for irradiation of materials or objects may include proposed alternatives for the requirements of this part. The Agency will approve the proposed alternatives if the applicant provides adequate rationale for the proposed alternatives and demonstrates that they are likely to provide an adequate level of safety for workers and the public.

§ 36.19 D

✓ Sec. Q.7 - Request for Written Statements. Each license is issued with the condition that the licensee will, at any time before expiration of the license, upon the Agency's request, submit a written statement to enable the Agency to determine whether the license should be modified, suspended, or revoked.

- Sec. Q 8 - Performance Criteria for Sealed Sources. § 36.21 B objectives to be *essentially identical*
- a. Requirements for sealed sources installed after [the effective date of the rule]:
 - i. Must have been evaluated in accordance with 10 CFR 32.210 or the equivalent state regulation;
 - ii. Must be doubly encapsulated;
 - iii. Must use radioactive material that is as nondispersible as practical and that is as insoluble as practical if the source is used in a wet-source-storage or wet-source-change irradiator;
 - iv. Must be encapsulated in a material resistant to general corrosion and to localized corrosion, such as 316L stainless steel or other material with equivalent resistance if the sources are for use in irradiator pools; and
 - v. In prototype testing of the sealed source, must have been leak tested and found leak-free after each of the tests described in Q.8b through Q.8g.
 - b. Temperature. The test source must be held at -40°C for 20 minutes, 600°C for one hour, and then be subjected to thermal shock test with a temperature drop from 600°C to 20°C within 15 seconds.
 - c. Pressure. The test source must be twice subjected for at least five minutes to an absolute external pressure of 2 million newtons per square meter.
 - d. Impact. A 2 kilogram steel weight, 2.5 centimeters in diameter, must be dropped from a height of 1 meter onto the test source.
 - e. Vibration. The test source must be subjected three times for ten minutes each to vibrations sweeping from 25 hertz to 500 hertz with a peak amplitude of five times the acceleration of gravity. In addition, each test source must be vibrated for 30 minutes at each resonant frequency found.
 - f. Puncture. A 50 gram weight and pin, 0.3 centimeter pin diameter, must be dropped from a height of 1 meter onto the test source.
 - g. Bend. If the length of the source is more than 15 times larger than the minimum cross-sectional dimension, the test source must be subjected to a force of 2000 newtons at its center equidistant from two support cylinders, the distance between which is ten times the minimum cross-sectional dimension of the source.

Sec. Q 9 - Access Control. — § 36.23 D, H + S

- a. Each entrance to a radiation room at a panoramic irradiator must have a door or other physical barrier to prevent inadvertent entry of personnel if the sources are not in the shielded position.

Product conveyor systems may serve as barriers as long as they reliably and consistently function as a barrier. It must not be possible to move the sources out of their shielded position if the door or barrier is open. Opening the door or barrier while the sources are exposed must cause the sources to return promptly to the shielded position. The personnel entrance door or barrier must have a lock that is operated by the same key used to move the sources. The control panel lock must be designed so that the key cannot be removed unless the sources have been returned to the shielded position. The doors and barriers must not prevent any individual in the radiation room from leaving. *added*

- b. ✓ In addition, each entrance to a radiation room at a panoramic irradiator must have an independent backup access control to detect personnel entry while the sources are exposed. Detection of entry while the sources are exposed must cause the sources to return to their fully shielded position and must also activate a visible and audible alarm to make the individual entering the room aware of the hazard. The alarm must also alert at least one other individual who is on-site of the entry. That individual shall be trained on how to respond to the alarm and prepared to promptly render or summon assistance.
- c. ✓ A radiation monitor must be provided to detect the presence of high radiation levels in the radiation room of a panoramic irradiator before personnel entry. The monitor must be integrated with personnel access door locks to prevent room access when radiation levels are high. Attempted personnel entry while the monitor measures high radiation levels must activate the alarm described in Q.9b. The monitor may be located in the entrance, normally referred to as the maze, but not in the direct radiation beam.
- d. ✓ Before the sources move from their shielded position in a panoramic irradiator, the source control must automatically activate conspicuous visible and audible alarms to alert people in the radiation room that the sources will be moved from their shielded position. The alarms must give individuals enough time to leave the room before the sources leave the shielded position.
- e. ✓ Each radiation room at a panoramic irradiator must have a clearly visible and readily accessible control that would allow an individual in the room to make the sources return to their fully shielded position.
- f. ✓ Each radiation room of a panoramic irradiator must contain a control that prevents the sources from moving from the shielded position unless the control has been activated and the door or barrier to the radiation room has been closed within a preset time after activation of the control.
- g. ✓ Each entrance to the radiation room of a panoramic irradiator and each entrance to the area within the personnel access barrier of an underwater irradiator must have a sign bearing the radiation symbol and the words, "Caution (or danger) radioactive material." Panoramic irradiators must also have a sign stating "Grave danger, very high radiation area," but the sign may be removed, covered, or otherwise made inoperative when the sources are fully shielded.
- h. ✓ If the radiation room of a panoramic irradiator has roof plugs or other movable shielding, it must not be possible to operate the irradiator unless the shielding is in its proper location. The

Part 20 language!

requirement may be met by interlocks that prevent operation if shielding is not placed properly or by an operating procedure requiring inspection of shielding before operating.

- i. ✓ Underwater irradiators must have a personnel access barrier around the pool which must be locked to prevent access when the irradiator is not attended. Only operators or facility management shall have access to keys that operate the personnel access barrier. There must be an intrusion alarm to detect unauthorized entry when the personnel access barrier is locked. Activation of the intrusion alarm must alert an individual who is not necessarily on-site but who is prepared to respond or summon assistance.

Sec. Q.10 - Shielding - § 36.25 D, H & S

- a. ✓ The radiation dose rate in areas that are normally occupied during operation of a panoramic irradiator may not exceed 0.02 millisievert (2 mrem) per hour at any location 30 centimeters or more from the wall of the room when the sources are exposed. The dose rate must be averaged over an area not to exceed 100 square centimeters having no linear dimension greater than 20 centimeters. Any area where the radiation dose rate exceeds 0.02 millisievert (2 mrem) per hour must be locked, roped off, or posted.
- b. ✓ The radiation dose at 30 centimeters over the edge of the pool of a pool irradiator may not exceed 0.02 millisievert (2 mrem) per hour when the sources are in the fully shielded position.
- c. ✓ The radiation dose rate at 1 meter from the shield of a dry-source-storage panoramic irradiator when the source is shielded may not exceed 0.02 millisievert (2 mrem) per hour and at 5 centimeters from the shield may not exceed 0.2 millisievert (20 mrem) per hour.

Sec. Q.11 - Fire Protection - § 36.27, H & S

- a. ✓ The radiation room at a panoramic irradiator must have heat and smoke detectors. The detectors must activate an audible alarm. The alarm must be capable of alerting a person who is prepared to summon assistance promptly. The sources must automatically become fully shielded if a fire is detected.
- b. ✓ The radiation room at a panoramic irradiator must be equipped with a fire extinguishing system capable of extinguishing a fire without the entry of personnel into the room. The system for the radiation room must have a shut-off valve to control flooding into unrestricted areas.

Sec. Q.12 - Radiation Monitors - § 36.29, H & S

- a. ✓ Irradiators with automatic product conveyor systems must have a radiation monitor with an audible alarm located to detect loose radioactive sources that are carried toward the product exit. If the monitor detects a source, an alarm must sound and product conveyors must stop automatically. The alarm must be capable of alerting an individual in the facility who is prepared to summon assistance. Underwater irradiators in which the product moves within an enclosed stationary tube are exempt from the requirements of this paragraph.

- b. ✓ Underwater irradiators that are not in a shielded radiation room must have a radiation monitor over the pool to detect abnormal radiation levels. The monitor must have an audible alarm and a visible indicator at entrances to the personnel access barrier around the pool. The audible alarm may have a manual shut-off. The alarm must be capable of alerting an individual who is prepared to respond promptly.

Sec. Q.13 - Control of Source Movement.

- § 36.31 D, H + S

- a. ✓ The mechanism that moves the sources of a panoramic irradiator must require a key to actuate. Actuation of the mechanism must cause an audible signal to indicate that the sources are leaving the shielded position. Only one key may be in use at any time, and only operators or facility management may possess it. The key must be attached to a portable radiation survey meter by a chain or cable. The lock for source control must be designed so that the key may not be removed if the sources are in an unshielded position. The door to the radiation room must require the same key.
- b. ✓ The console of a panoramic irradiator must have a source position indicator that indicates when the sources are in the fully shielded position, when they are in transit, and when the sources are exposed.
- c. ✓ The control console of a panoramic irradiator must have a control that promptly returns the sources to the shielded position.
- d. ✓ Each control for a panoramic irradiator must be clearly marked as to its function.

Sec. Q.14 - Irradiator Pools.

- § 36.33 D, H + S

- a. ✓ For licenses initially issued after [the effective date of the rule], irradiator pools must either:
- i. ✓ Have a water-tight stainless steel liner or a liner metallurgically compatible with other components in the pool; or
 - ii. ✓ Be constructed so that there is a low likelihood of substantial leakage and have a surface designed to facilitate decontamination. In either case, the licensee shall have a method to safely store the sources during repairs of the pool.
- b. ✓ For licenses initially issued after [the effective date of the rule], irradiator pools must have no outlets more than 0.5 meter below the normal low water level that could allow water to drain out of the pool. Pipes that have intakes more than 0.5 meter below the normal low water level and that could act as siphons must have siphon breakers to prevent the siphoning of pool water.
- c. ✓ A means must be provided to replenish water losses from the pool.
- d. ✓ A visible indicator must be provided in a clearly observable location to indicate if the pool water level is below the normal low water level or above the normal high water level.

- e. ✓ Irradiator pools must be equipped with a purification system designed to be capable of maintaining the water during normal operation at a conductivity of 20 microsiemens per centimeter or less and with a clarity so that the sources can be seen clearly.
- f. ✓ A physical barrier, such as a railing or cover, must be used around or over irradiator pools during normal operation to prevent personnel from accidentally falling into the pool. The barrier may be removed during maintenance, inspection, and service operations.
- g. ✓ If long-handled tools or poles are used in irradiator pools, the radiation dose rate to the operator at the handling areas of the tools may not exceed 0.02 millisievert (2 r:rem) per hour.

✓ Sec. Q 15 - Source Rack Protection - 536.35 D
 If the product to be irradiated moves on a product conveyor system, the source rack and the mechanism that moves the rack must be protected by a carrier or guides to prevent products and product carriers from hitting or touching the rack or mechanism.

Sec. Q 16 - Power Failures - 536.37 D, H + S

- a. ✓ If electrical power at a panoramic irradiator is lost for longer than ten seconds, the sources must automatically return to the shielded position.
- b. ✓ The lock on the door of the radiation room of a panoramic irradiator must remain locked in the event of a power failure.
- c. ✓ During a power failure, the area of any irradiator where sources are located may be entered only when using an operable and calibrated radiation survey meter.

✓ Sec. Q 17 - Design Requirements - 36.39 D, H + S
 Irradiators whose construction begins after [the effective date of the rule], must meet the design requirements of this section. shielding ✓

- a. ✓ Shielding For panoramic irradiators, the licensee shall design shielding walls to meet generally accepted building code requirements for reinforced concrete and design the walls, wall penetrations, and entranceways to meet the radiation shielding requirements of Q.10. If the irradiator will use more than 2×10^{17} becquerels (5 million Ci) of activity, the licensee shall evaluate the effects of heating of the shielding walls by the irradiator source.
- b. ✓ Foundations For panoramic irradiators, the licensee shall design the foundation, with consideration given to soil characteristics, to ensure it is adequate to support the weight of the facility shield walls.
- c. ✓ Pool integrity For pool irradiators, the licensee shall design the pool to assure that it is leak resistant, that it is strong enough to bear the weight of the pool water and shipping casks, that a dropped cask would not fall on sealed sources, that all outlets or pipes meet the requirements of Q.14b, and that metal components are metallurgically compatible with other components in the pool.

irradiator pools

- d. Water handling system. For pool irradiators, the licensee shall verify that the design of the water purification system is adequate to meet the requirements of Q.14e. The system must be designed so that water leaking from the system does not drain to unrestricted areas without being monitored. *pool irradiators*
- e. Radiation monitors. For all irradiators, the licensee shall evaluate the location and sensitivity of the monitor to detect sources carried by the product conveyor system as required by Q.12a. The licensee shall verify that the product conveyor is designed to stop before a source on the product conveyor would cause a radiation overexposure to any person. For pool irradiators, if the licensee uses radiation monitors to detect contamination under Q.23b, the licensee shall verify that the design of radiation monitoring systems to detect pool contamination includes sensitive detectors located close to where contamination is likely to concentrate. *Radiation monitors*
- f. Source rack. For pool irradiators, the licensee shall verify that there are no crevices on the source or between the source and source holder that would promote corrosion on a critical area of the source. For panoramic irradiators, the licensee shall determine that source rack drops due to loss of power will not damage the source rack and that source rack drops due to failure of cables, or alternate means of support, will not cause loss of integrity of sealed sources. For panoramic irradiators, the licensee shall review the design of the mechanism that moves the sources to assure that the likelihood of a stuck source is low and that, if the rack sticks, a means exists to free it with minimal risk to personnel. *detection of sealed sources*
- g. Access control. For panoramic irradiators, the licensee shall verify from the design and logic diagram that the access control system will meet the requirements of Q.9. *access control*
- h. Fire protection. For panoramic irradiators, the licensee shall verify that the number, locations, and spacing of the smoke and heat detectors are appropriate to detect fires and that the detectors are protected from mechanical and radiation damage. The licensee shall verify that the design of the fire extinguishing system provides the necessary discharge patterns, densities, and flow characteristics for complete coverage of the radiation room and that the system is protected from mechanical and radiation damage.
- i. Source return. For panoramic irradiators, the licensee shall verify that the source rack will automatically return to the fully shielded position if power is lost for more than ten seconds.
- j. Seismic. For panoramic irradiators to be built in seismic areas, the licensee shall design the reinforced concrete radiation shields to retain their integrity in the event of an earthquake by designing to the seismic requirements of an appropriate source such as the American Concrete Institute Standard ACI 318-89, "Building Code Requirements for Reinforced Concrete," Chapter 21, "Special Provisions for Seismic Design," or local building codes, if current.
- k. Wiring. For panoramic irradiators, the licensee shall verify that electrical wiring and electrical equipment in the radiation room are selected to minimize failures due to prolonged exposure to radiation.

536.41 D, H+S

Sec. Q 18 - Construction Monitoring and Acceptance Testing. The requirements of this section must be met for irradiators whose construction begins after [the effective date of the rule]. The requirements must be met prior to loading sources.

- a. Shielding. For panoramic irradiators, the licensee shall monitor the construction of the shielding to verify that its construction meets design specifications and generally accepted building code requirements for reinforced concrete.
- b. Foundations. For panoramic irradiators, the licensee shall monitor the construction of the foundations to verify that their construction meets design specifications.
- c. Pool integrity. For pool irradiators, the licensee shall verify that the pool meets design specifications and shall test the integrity of the pool. The licensee shall verify that outlets and pipes meet the requirements of Q.14b. *iradiator pools*
- d. Water handling system. For pool irradiators, the licensee shall verify that the water purification system, the conductivity meter, and the water level indicators operate properly.
- e. Radiation monitors. For all irradiators, the licensee shall verify the proper operation of the monitor to detect sources carried on the product conveyor system and the related alarms and interlocks required by Q.12a. For pool irradiators, the licensee shall verify the proper operation of the radiation monitors and the related alarm if used to meet Q.23b. For underwater irradiators, the licensee shall verify the proper operation of the over-the-pool monitor, alarms, and interlocks required by Q.12b. *radiation monitor*
rad. mon. *detection of leakage sources*
- f. Source rack. For panoramic irradiators, the licensee shall test the movement of the source racks for proper operation prior to source loading; testing must include source rack lowering due to simulated loss of power. For all irradiators with product conveyor systems, the licensee shall observe and test the operation of the conveyor system to assure that the requirements in Q.15 are met for protection of the source rack and the mechanism that moves the rack; testing must include tests of any limit switches and interlocks used to protect the source rack and mechanism that moves that rack from moving product carriers. *source rack protection*
- g. Access control. For panoramic irradiators, the licensee shall test the completed access control system to assure that it functions as designed and that all alarms, controls, and interlocks work properly.
- h. Fire protection. For panoramic irradiators, the licensee shall test the ability of the heat and smoke detectors to detect a fire, to activate alarms, and to cause the source rack to automatically become fully shielded. The licensee shall test the operability of the fire extinguishing system.
- i. Source return. For panoramic irradiators, the licensee shall demonstrate that the source racks can be returned to their fully shielded positions without power.
- j. Computer systems. For panoramic irradiators that use a computer system to control the access control system, the licensee shall verify that the access control system will operate properly if

power is lost and shall verify that the computer has security features that prevent an irradiator operator from commanding the computer to override the access control system when the system is required to be operable.

- k. Wiring. For panoramic irradiators, the licensee shall verify that the electrical wiring and electrical equipment that were installed meet the design specifications.

Sec. Q.19 - Training

- § 36.51 D, H + S

- a. Before an individual is permitted to act as an irradiator operator without a supervisor present, the individual must be instructed in:
- i. The fundamentals of radiation protection applied to irradiators. This must include the differences between external radiation and radioactive contamination, units of radiation dose, dose limits, why large radiation doses must be avoided, how shielding and access controls prevent large doses, how an irradiator is designed to prevent contamination, the proper use of survey meters and personnel dosimeters, other radiation safety features of an irradiator, and the basic function of the irradiator;
 - ii. The requirements of Parts J and Q of these rules that are relevant to the irradiator;
 - iii. The operation of the irradiator;
 - iv. Those operating and emergency procedures listed in Q 20 that the individual is responsible for performing; and
 - v. Case histories of accidents or problems involving irradiators.
- Operating + Emergency Procedures*
- b. Before an individual is permitted to act as an irradiator operator without a supervisor present, the individual shall pass a written test on the instruction received consisting primarily of questions based on the licensee's operating and emergency procedures that the individual is responsible for performing and other operations necessary to safely operate the irradiator without supervision.
- c. Before an individual is permitted to act as an irradiator operator without a supervisor present, the individual must have received on-the-job training or simulator training in the use of the irradiator as described in the license application. The individual shall also demonstrate the ability to perform those portions of the operating and emergency procedures that he or she is to perform.
- d. The licensee shall conduct safety reviews for irradiator operators at least annually. The licensee shall give each operator a brief written test on the information. Each safety review must include, to the extent appropriate, each of the following:
- i. Changes in operating and emergency procedures since the last review, if any;
 - ii. Changes in regulations and license conditions since the last review, if any,

- iii. ✓ Reports on recent accidents, mistakes, or problems that have occurred at irradiators, if any;
 - iv. ✓ Relevant results of inspections of operator safety performance;
 - v. ✓ Relevant results of the facility's inspection and maintenance checks; and
 - vi. ✓ A drill to practice an emergency or abnormal event procedure.
- e. ✓ The licensee shall evaluate the safety performance of each irradiator operator at least annually to ensure that regulations, license conditions, and operating, safety, and emergency procedures are followed. The licensee shall discuss the results of the evaluation with the operator and shall instruct the operator on how to correct any mistakes or deficiencies observed.
- f. ✓ Individuals who will be permitted unescorted access to the radiation room of the irradiator or the area around the pool of an underwater irradiator, but who have not received the training required for operators and the radiation safety officer, shall be instructed and tested in any precautions they should take to avoid radiation exposure, any procedures or parts of procedures listed in Q 20 that they are expected to perform or comply with, and their proper response to alarms required in this part. Tests may be oral.
- g. ✓ Individuals who must be prepared to respond to alarms required by Q 9b and i., Q 11a, Q 12a, and Q 23b shall be trained and tested on how to respond. Each individual shall be retested at least annually. Tests may be oral.

Access control
Fire Pro, Op 4 EP
Rad Mon

Sec. Q 20 - Operating and Emergency Procedures.

- § 36.53 D, H + S

- a. ✓ The licensee shall have and follow written operating procedures for:
- i. ✓ Operation of the irradiator, including entering and leaving the radiation room;
 - ii. ✓ Use of personnel dosimeters;
 - iii. ✓ Surveying the shielding of panoramic irradiators;
 - iv. ✓ Monitoring pool water for contamination while the water is in the pool and before release of pool water to unrestricted areas;
 - v. ✓ Leak testing of sources;
 - vi. ✓ Inspection and maintenance checks required by Q 24.;
 - vii. ✓ Loading, unloading, and repositioning sources, if the operations will be performed by the licensee; and
 - viii. ✓ Inspection of movable shielding required by Q 9h, if applicable.

Ins. & Maint.

Access control

- f. The licensee shall have and follow emergency or abnormal event procedures, appropriate for the irradiator type, for:
- i. Sources stuck in the unshielded position;
 - ii. Personnel overexposures;
 - iii. A radiation alarm from the product exit portal monitor or pool monitor;
 - iv. Detection of leaking sources, pool contamination, or alarm caused by contamination of pool water;
 - v. A low or high water level indicator, an abnormal water loss, or leakage from the source storage pool;
 - vi. A prolonged loss of electrical power;
 - vii. A fire alarm or explosion in the radiation room;
 - viii. An alarm indicating unauthorized entry into the radiation room, area around pool, or another alarmed area;
 - ix. Natural phenomena, including an earthquake, a tornado, flooding, or other phenomena as appropriate for the geographical location of the facility; and
 - x. The jamming of automatic conveyor systems.
- c. The licensee may revise operating and emergency procedures without Agency approval only if all of the following conditions are met:
- i. The revisions do not reduce the safety of the facility;
 - ii. The revisions are consistent with the outline or summary of procedures submitted with the license application;
 - iii. The revisions have been reviewed and approved by the radiation safety officer; and
 - iv. The users or operators are instructed and tested on the revised procedures before they are put into use.

Sec. Q.21 - Personnel Monitoring.

- 58655 D

- a. Irradiator operators shall wear either a film badge or a thermoluminescent dosimeter (TLD) while operating a panoramic irradiator or while in the area around the pool of an underwater irradiator. The film badge or TLD processor must be accredited by the National Voluntary Laboratory

Accreditation Program for high energy photons in the normal and accident dose ranges [see Part D.501.c]. Each film badge or TLD must be assigned to and worn by only one individual. Film badges must be processed at least monthly, and TLDs must be processed at least quarterly.

- b. ✓ Other individuals who enter the radiation room of a panoramic irradiator shall wear a dosimeter, which may be a pocket dosimeter. For groups of visitors, only two people who enter the radiation room are required to wear dosimeters. If pocket dosimeters are used to meet the requirements of the paragraph, a check of their response to radiation must be done at least annually. Acceptable dosimeters must read within $\pm 20\%$ of the true radiation dose. *Part 30 days*

✓ Sec. Q 22 - Radiation Surveys - \$36.57 D, H + S quantitative values

- a. ✓ A radiation survey of the area outside the shielding of the radiation room of a panoramic irradiator must be conducted with the sources in the exposed position before the facility starts to operate. A radiation survey of the area above the pool of pool irradiators must be conducted after the sources are loaded but before the facility starts to operate. Additional radiation surveys of the shielding must be performed at intervals not to exceed (three years) and before resuming operation after addition of new sources or any modification to the radiation room shielding or structure that might increase dose rates. *Shielding ?*
- b. ✓ If the radiation levels specified in Q. 10 are exceeded, the facility must be modified to comply with the requirements in Q. 10.
- c. ✓ Portable radiation survey meters must be calibrated at least annually to an accuracy of $\pm 20\%$ for the gamma energy of the sources in use. The calibration must be done at two points on each scale or, for digital instruments, at one point per decade over the range that will be used. Portable radiation survey meters must be of a type that does not saturate and read zero at high radiation dose rates.
- d. ✓ Water from the irradiator pool, other potentially contaminated liquids, and sediments from pool vacuuming must be monitored for radioactive contamination before release to unrestricted areas. Radioactive concentrations must not exceed those specified in Part D, Table II, Column 2 or Table III of Appendix B, "Annual Limits on Intake (ALIs) and Derived Air Concentrations (DAC) of Radionuclides for Occupational Exposure; Effluent Concentrations; Concentrations for Release to Sanitary Sewerage."
- e. ✓ Before releasing resins for unrestricted use, they must be monitored before release in an area with a background level less than 0.5 microsievert (0.05 mrem) per hour. The resins may be released only if the survey does not detect radiation levels above background radiation levels. The survey meter used must be capable of detecting radiation levels of 0.5 microsievert (0.05 mrem) per hour.

Sec. Q 23 - Detection of Leaking Sources

- §36.59 D, H+S

- a. ✓ Each dry-source storage sealed source must be tested for leakage at intervals not to exceed six months using a leak test kit or method approved by the Agency, the Nuclear Regulatory Commission, an Agreement State, or a Licensing State. In the absence of a certificate from a transferor that a test has been made within the six months before the transfer, the sealed source may not be used until tested. The test must be capable of detecting the presence of 200 becquerels (0.005 μCi) of radioactive material and must be performed by a person approved by the Agency, the Nuclear Regulatory Commission, an Agreement State, or a Licensing State to perform the test.
- b. ✓ For pool irradiators, sources may not be put into the pool unless the licensee tests the sources for leaks or has a certificate from a transferor that leak test has been done within the six months before the transfer. Water from the pool must be checked for contamination each day the irradiator operates. The check may be done either by using a radiation monitor on a pool water circulating system or by analysis of a sample of pool water. If a check for contamination is done by analysis of a sample of pool water, the results of the analysis must be available within 24 hours. If the licensee uses a radiation monitor on a pool water circulating system, the detection of above normal radiation levels must activate an alarm. The alarm set-point must be set as low as practical, but high enough to avoid false alarms. The licensee may reset the alarm set-point to a higher level if necessary to operate the pool water purification system to clear up contamination in the pool if specifically provided for in written emergency procedures.
- c. ✓ If a leaking source is detected, the licensee shall arrange to remove the leaking source from service and have it decontaminated, repaired, or disposed of by an Agency, the Nuclear Regulatory Commission, an Agreement State, or a Licensing State licensee that is authorized to perform these functions. The licensee shall promptly check its personnel, equipment, facilities, and irradiated product for radioactive contamination. No product may be shipped until the product has been checked and found free of contamination. If a product has been shipped that may have been inadvertently contaminated, the licensee shall arrange to locate and survey that product for contamination. If any personnel are found to be contaminated, decontamination must be performed promptly. If contaminated equipment, facilities, or products are found, the licensee shall arrange to have them decontaminated or disposed of by an Agency, the Nuclear Regulatory Commission, an Agreement State, or a Licensing State licensee that is authorized to perform these functions. If a pool is contaminated, the licensee shall arrange to clean the pool until the contamination levels do not exceed the appropriate concentration in Table 2, Column 2, Appendix B of Part D. See 10 CFR 30.50, or the equivalent state regulations, for reporting requirements.

Sec. Q 24 - Inspection and Maintenance

§36.61 D, H+S

- a. ✓ The licensee shall perform inspection and maintenance checks that include, as a minimum, each of the following at the frequency specified in the license or license application:
- i. ✓ Operability of each aspect of the access control system required by Q.9. ✓ Access control
- ii. ✓ Functioning of the source position indicator required by Q.13b. ✓ Control of Source Movement

- iii. ✓ Operability of the radiation monitor for radioactive contamination in pool water required by Q.23b using a radiation check source, if applicable.
 - iv. ✓ Operability of the over-pool radiation monitor at underwater irradiators as required by Q.12b. *Rad Mon*
 - v. ✓ Operability of the product exit monitor required by Q.12a. *Rad Mon*
 - vi. ✓ Operability of the emergency source return control required by Q.13c. *Control*
 - vii. ✓ Visual inspection of leak-tightness of systems through which pool water circulates. *Fire*
 - viii. ✓ Operability of the heat and smoke detectors and extinguisher system required by Q.11, without turning extinguishers on.
 - ix. ✓ Operability of the means of pool water replenishment required by Q.14c. *In. Pool*
 - x. ✓ Operability of the indicators of high and low pool water levels required by Q.14d. *Sub. Pool*
 - xi. ✓ Operability of the intrusion alarm required by Q.9i, if applicable. *Access Control*
 - xii. ✓ Functioning and wear of the system, mechanisms, and cables used to raise and lower sources.
 - xiii. ✓ Condition of the barrier to prevent products from hitting the sources or source mechanism as required by Q.15. *Source Rack, Pro.*
 - xiv. ✓ Amount of water added to the pool to determine if the pool is leaking.
 - xv. ✓ Electrical wiring on required safety systems for radiation damage.
 - xvi. ✓ Pool water conductivity measurements and analysis as required by Q.25b. *Pool Water Purity*
- b. ✓ Malfunctions and defects found during inspection and maintenance checks must be repaired within time frames specified in the license or license application.

✓ Sec. Q 25 - Pool Water Purity - § 36.63 D, H + S

- va. Pool water purification system must be run sufficiently to maintain the conductivity of the pool water below 20 microsiemens per centimeter under normal circumstances. If pool water conductivity rises above 20 microsiemens per centimeter, the licensee shall take prompt actions to lower the pool water conductivity and shall take corrective actions to prevent future recurrences.

- b. ✓ The licensee shall measure the pool water conductivity frequently enough, but no less than weekly, to assure that the conductivity remains below 20 microsiemens per centimeter. Conductivity meters must be calibrated at least annually.

Sec. Q.26 - Attendance During Operation. - § 36.65 D, H+S

- a. ✓ Both an irradiator operator and at least one other individual, who is trained on how to respond and prepared to promptly render or summon assistance if the access control alarm sounds, shall be present on site:
 - i. ✓ Whenever the irradiator is operated using an automatic product conveyor system; and
 - ii. ✓ Whenever the product is moved into or out of the radiation room when the irradiator is operated in a batch mode.
- b. ✓ At a panoramic irradiator at which static irradiations with no movement of the product are occurring, a person who has received the training on how to respond to alarms described in Q.19g must be on site.

Training
Q.19g
§ 36.51(g)
- c. ✓ At an underwater irradiator, an irradiator operator must be present at the facility whenever the product is moved into or out of the pool. Individuals who move the product into or out of the pool of an underwater irradiator need not be qualified as irradiator operators; however, they must have received the training described in Q.19f and Q.19g. Static irradiations may be performed without a person present at the facility.

§ 36.61

Sec. Q.27 - Entering and Leaving the Radiation Room. - § 36.67 D, H+S

- a. ✓ Upon first entering the radiation room of a panoramic irradiator after an irradiation, the irradiator operator shall use a survey meter to determine that the source has returned to its fully shielded position. The operator shall check the functioning of the survey meter with a radiation check source prior to entry.
- b. ✓ Before exiting from and locking the door to the radiation room of a panoramic irradiator prior to a planned irradiation, the irradiator operator shall:
 - i. ✓ Visually inspect the entire radiation room to verify that no one else is in it; and
 - ii. ✓ Activate a control in the radiation room that permits the sources to be moved from the shielded position only if the door to the radiation room is locked within a preset time after setting the control.
- c. During a power failure, the area around the pool of an underwater irradiator may not be entered without using an operable and calibrated radiation survey meter unless the over-the-pool monitor required by Q.12b is operating with backup power.

§ 36.29 (b)
Radiation monitors
Q18

Sec. Q.28 - Irradiation of Explosive or Flammable Materials.

- § 36.69 D, H & S

- a. ✓ Irradiation of explosive material is prohibited unless the licensee has received prior written authorization from the Agency. Authorization will not be granted unless the licensee can demonstrate that detonation of the explosive would not rupture the sealed sources, injure personnel, damage safety systems, or cause radiation overexposures of personnel.
- b. ✓ Irradiation of more than small quantities of flammable material with a flash point below 140°F is prohibited in panoramic irradiators unless the licensee has received prior written authorization from the Agency. Authorization will not be granted unless the licensee can demonstrate that a fire in the radiation room could be controlled without damage to sealed sources or safety systems and without radiation overexposures of personnel.

Sec. Q.29 - Records and Retention Periods. The licensee shall maintain the following records at the irradiator for the periods specified.

- § 36.81 D

- a. ✓ A copy of the license, the license conditions, documents incorporated into the license by reference, and amendments thereto until superseded by new documents or until the Agency terminates the license for documents not superseded.
- b. ✓ Records of each individual's training, tests, and safety reviews provided to meet the requirements of Q.19a., b., c., d., f., and g. until [three years] after the individual terminates work.
- c. ✓ Records of the annual evaluations of the safety performance of irradiator operators required by Q.19e. for [three years] after the evaluation.
- d. ✓ A copy of the current operating and emergency procedures required by Q.20 until superseded or the Agency terminates the license. Records of the radiation safety officer's review and approval of changes in procedures as required by Q.20c.iii. retained for [three years] from the date of the change.
- e. ✓ Film badge and TLD results required by Q.21 until the Agency terminates the license.
- f. ✓ Records of radiation surveys required by Q.22 for [three years] from the date of the survey.
- g. ✓ Records of radiation survey meter calibrations required by Q.22 and pool water conductivity meter calibrations required by Q.25.b until [three years] from the date of calibration.
- h. ✓ Records of the results of leak tests required by Q.23a. and the results of contamination checks required by Q.23b. for [three years] from the date of each test.
- i. ✓ Records of inspection and maintenance checks required by Q.24 for [three years].
- j. ✓ Records of major malfunctions, significant defects, operating difficulties or irregularities, and major operating problems that involve required radiation safety equipment for [three years] after repairs are completed.

- k. ✓ Records of the receipt, transfer and disposal, of all licensed sealed sources as required by Part C and 10 CFR 30.51 or the equivalent state regulations.
- l. ✓ Records on the design checks required by Q.17 and the construction control checks as required by Q.18 until the license is terminate. The records must be signed and dated. The title or qualification of the person signing must be included. *records §36.39 Part B requirements Transfer of 30.41 by Mat.*
- m. ✓ Records related to decommissioning of the irradiator as required by 10 CFR 30.35(g) or the equivalent state regulation.

Sec. Q.30 - Reports.

§36.83 C

- a. ✓ In addition to the reporting requirements in other parts of these regulations, the licensee shall report the following events if not reported under other parts of these regulations:
 - i. ✓ Source stuck in an unshielded position.
 - ii. ✓ Any fire or explosion in a radiation room.
 - iii. ✓ Damage to the source racks.
 - iv. ✓ Failure of the cable or drive mechanism used to move the source racks.
 - v. ✓ Inoperability of the access control system.
 - vi. ✓ Detection of radiation source by the product exit monitor.
 - vii. ✓ Detection of radioactive contamination attributable to licensed radioactive material.
 - viii. ✓ Structural damage to the pool liner or walls.
 - ix. ✓ Water loss or leakage from the source storage pool, greater than the irradiator pool design parameters submitted by the licensee or applicant. *(slight word change)*
 - x. ✓ Pool water conductivity exceeding 100 microsiemens per centimeter.
- b. ✓ The report must include a telephone report within 24 hours as described in 10 CFR 30.50(c)(1), or the equivalent state regulation, and a written report within 30 days as described in 10 CFR 30.50(c)(2) or the equivalent state regulation.

abnormal

§ 36.91 Violations D

§ 36.93 Criminal penalties D

**1997
Rationale for Revisions**

**Part Q
Licensing and Radiation Safety
Requirements for Irradiators**

Need for a New Part in the SSRCR

Part Q of the Suggested State Regulations for Control of Radiation (SSRCR) covers the licensing and radiatic safety requirements for the use of licensed radioactive materials in irradiators. Irradiators use gamma radiation to irradiate products to change their characteristics in some way. The safety requirements apply to panoramic irradiators (those in which the material being irradiated is in air in a room that is accessible to personnel when the source is shielded) and underwater irradiators in which the source always remains shielded under water, and the product is irradiated under water. The rule does not cover self-contained dry-source-storage irradiator devices, medical uses of sealed sources (such as teletherapy), or nondestructive testing (such as industrial radiography). These regulations were published as a final rule in the Federal Register on February 9, 1993 (58 FR 7715) and became effective July 1, 1993.

Compatibility Requirements

The Nuclear Regulatory Commission (NRC) considers the adoption of a regulation equivalent to 10 CFR 36 a matter of compatibility for Agreement States. On December 4, 1990, the NRC published in the Federal Register (55 FR 50008) a proposed new part, 10 CFR 36. Based on public comments and other considerations, the NRC adopted the proposed regulation with modifications as set forth in 58 FR 7715. Further background information on the development of this regulation is contained in the final regulation published in the Federal Register on February 9, 1993 (58 FR 7715).

Revise
The regulation is a Level 2 Division of compatibility, which allows the Agreement States to adopt additional requirements based on local concerns or experience. However, because only a small number of Agreement States have operating irradiators effected by this regulation the need for implementation as a matter of compatibility has been questioned by some Agreement States that do not have Part Q licensees. In particular, the NRC concluded in August of 1994 that the State of Iowa's position to postpone development and adoption of the 10 CFR Pat 36 equivalent rulemaking was acceptable and would not effect the compatibility determination for their program. However, the NRC also stated that they would expect Iowa to take action to adopt the provisions of Part 36 if an application for a large irradiator were to be received.

Matter for Future Consideration

1. In different sections within Part Q, the applicable 10 CFR parts were referenced instead of the equivalent SSRCR sections. This was done because the current SSRCR does not include the equivalent 10 CFR Parts 30.35(g), 30.50 and 30.51. To correct this, the applicable CFR parts were referenced and "or the equivalent state regulation" was added for those states that may already have the equivalent parts. Once the equivalent parts are added to the SSRCR, then the references to the 10 CFR parts should be changed to reflect the corresponding SSRCP parts. The

only exception is Q.8.a.i, which references 10 CFR 32.210. This reference pertains to sealed source evaluations and should be referenced by Part Q because not all states evaluate sealed sources. Therefore, this CFR reference is needed.