

4.7 Event and Allegation Response Program Elements

This section of the application addresses how the Department will respond to radioactive materials events and allegations. The Department has modeled its event and allegation response elements after those in the NRC procedures SA-300 *Reporting Material Events* and SA-400 *Management of Allegations*. The Department has four written procedures to address these elements. These procedures are listed below and contained at the end of this section of the application.

RCP No.	Title
RCP 904.1	Management of Allegations
RCP 904.2	Incident Response
RCP 904.3	Nuclear Materials Event Database (NMED) Input
RCP 403	Responding to Incidents at a Solid Waste and Metal Recycling Facilities Equipped with Radiation Monitoring Systems

Section 4.7.1 of the application describes the procedures for responding to events and allegations and Section 4.7.2 describes procedures for identifying significant events and submittals for entry into the NMED.

4.7.1 Procedures for Responding to Events and Allegation

SA-700 Section 4.7.1.1

The procedures for responding to events and allegations are attached to this section of the application. RCP 904.1 *Management of Allegations* describes how the Department will respond to allegations, while RCP 904.2 *Incident Response* describes the response actions for the broad range of radioactive materials incidents and RCP 403 *Responding to Incidents at a Solid Waste and Metal Recycling Facilities Equipped with Radiation Monitoring Systems* describes the responses specific to scrap yard incidents and alarms.

SA-700 Section 4.7.1.2

For event response, the procedures are consistent with, but not identical to, those of the NRC. They address immediate response (via the Everbridge© notification system) and actions to mitigate an event; follow-up inspections and enforcement actions; notifications to licensing staff; reports to the incident file; and notifications to other affected licensees of generic problems. In addition, if Department management determines that immediate action is necessary to prevent imminent danger to public health or environment, RCP 904.2 provides guidance for pursuing cease and desist or impoundment actions.

The allegation procedure (RCP 904.1) addresses allegation response, follow-up, and closeout. It provides for the protection of the identity of a person making an allegation and other confidential information consistent with Connecticut state law.

4.7.2 Procedures for Identifying Significant Events and Submittals for Entry into the Nuclear Material Events Database

SA-700 Section 4.7.2.1

RCP 904.3 *Nuclear Material Event Database (NMED) Input* provides instructions for identifying significant events and submittals for entry into the Nuclear Materials Event Database (NMED). Guidance in RCP 904.3 is consistent with that in SA-300 Handbook *Nuclear Material Event Reporting in the Agreement States*. RCP 904.3 is attached at the end of this section of the application.

SA-700 Section 4.7.2.2

RCP 904.3 describes how the Department will generate event reports and submit them to NMED within required time frames and as required by regulation. Responsibilities are assigned for the completion of reports and for ensuring the quality of reports. Criteria are included for identifying abnormal occurrences and reportable events, and guidance is provided for notification, follow-up and closeout of reports. State procedures are consistent with the SA-300 Handbook, *Nuclear Material Event Reporting in the Agreement States*.