



State of Connecticut Department of Energy and Environmental Protection

Radioactive Materials Program

RCP-904.2

Incident Response

Prepared By: Kristina Verderame **Date:** _____

Reviewed By: _____ **Date:** _____

Approved By: _____ **Date:** _____

Revision	Date	Description of Changes

TABLE OF CONTENTS

SECTION	TITLE	PAGE
1.0	<u>PURPOSE</u>	4
2.0	<u>SCOPE</u>	4
3.0	<u>REFERENCES</u>	5
4.0	<u>DEFINITIONS AND ABBREVIATIONS</u>	5
5.0	<u>GENERAL</u>	7
	5.1 Responsibilities.....	7
	5.2 Records.....	9
	5.3 Prerequisites.....	9
6.0	<u>PROCEDURE</u>	9
	6.1 Incident Type and Classification.. ..	9
	6.2 Initial Notification.....	10
	6.3 On-Scene Response.....	13
	6.4 Report.....	16
	6.5 Follow-Up.....	16
	6.6 Communicating Events to Appropriate Agencies.....	17
	 <u>ATTACHMENTS</u>	
	ATTACHMENT 1 Radiation Control Incident Report.....	18
	ATTACHMENT 2 Radiation Incident Response Q&A.....	20
	ATTACHMENT 3 Impoundment Guidelines.....	21
	ATTACHMENT 4 Material Event Reporting for the Agreement States.....	22

1.0 PURPOSE

This procedure addresses preparation for, response to, and reporting for a radiological incident or an abnormal occurrence (AO), which is any unscheduled incident or event which the NRC/Department determines to be significant from the standpoint of public health and safety.

2.0 SCOPE

This applies to all Connecticut Department of Energy and Environmental Protection (Department), Radioactive Materials Program (RMP) staff responding to an incident involving real or suspected licensable radioactive materials. This does not apply to incidents involving nuclear power facilities, spent nuclear fuel storage installations, other fuel processing facilities licensed by the Nuclear Regulatory Commission, or other facilities that fall under exclusive Federal jurisdiction. This procedure does not apply to a known or suspected terrorist incident or attack.

If terrorism is known or possible, contact the Local Law Enforcement Agency, Connecticut State Police, and Connecticut Department of Emergency Management and Homeland Security immediately. If the need for criminal investigatory capacity is required, contact the Local Law Enforcement Agency and/or the Connecticut State Police and/or the U.S. Federal Bureau of Investigation, as appropriate.

The Radiation Division maintains a minimum of three staff on-call 24/7 to respond to radiological emergencies. On-call personnel are notified by the Department's full-time Emergency Dispatch Center. Each on-call staff member is equipped with an emergency response vehicle, which they home garage, a variety of radiation detection instruments and appropriate personnel protective equipment. This allows staff the ability to immediately respond to radiological incidents, such as lost, discovered, abandoned or stolen radioactive material.

For the purposes of radiological emergency response, license compliance, and inspections, the Division owns, operates, and maintains over three hundred radiation-detecting devices. The Division is equipped with significant resources for routine and non-routine radiation protection activity. This includes a large number of handheld instruments and assorted probes, portable gamma ray spectroscopy instruments, fixed gamma detectors, and laboratory equipment as well as emergency response supplies and emergency response vehicles.

3.0 REFERENCES

- 3.1 Sections 22a-148 through 22a-165(h) of Chapter 446a – Radiation and Radioactive Materials of the Connecticut General Statutes
- 3.2 Sections 22a-153-1 to 22a-153-150, inclusive, of the Regulations of Connecticut State Agencies
- 3.3 NRC SA-300, “Reporting Material Events.” And “Handbook on Nuclear Material Event Reporting for the Agreement States”
- 3.4 NRC Management Directive 8.1 Abnormal Occurrence Reporting Procedure
- 3.5 New England Radiological Health Compact: Interstate Radiation Incident Plan

4.0 DEFINITIONS AND ABBREVIATIONS

- 4.1 Abnormal Occurrence (AO): An unscheduled incident or event that the U.S. Nuclear Regulatory Commission determines to be significant from the standpoint of public health or safety.
- 4.2 Apparent Violation: A potential noncompliance with a regulatory requirement that has not yet been formally cited as a violation or order.
- 4.3 Department: The Radioactive Materials Program (RMP) of the Connecticut Department of Energy and Environmental Protection (Department).
- 4.4 Escalated Enforcement Action: An enforcement action for any Very High, High, or Moderate Category of Harm violations. Violations with willful aspects (i.e. careless disregard or deliberate misconduct) will typically be considered for escalated enforcement.
- 4.5 Immediate Notification: For this procedure, notification is required to be made to the Department by the licensee or its representative (Radiation Safety Officer) after the licensee identifies the incident (see Section 6). Notification is required to be within 4 hours or less of the identification that an incident has occurred.
- 4.6 Investigation: an inquiry necessary to gather sufficient facts to determine whether a violation or noncompliance has occurred or to determine if any person is causing, engaging in or maintaining, or is about to cause, engage in or maintain, any condition or activity that, in the commissioner's judgment, will result in or is likely to result in imminent threat to human health or the environment.
- 4.7 Noncompliance: A violation or deviation.

- 4.8 Notice of Violation (NOV): A written notice that sets forth one or more apparent violations of a requirement following an inspection. An NOV documents violations and is typically the only enforcement action taken unless the criteria for escalated enforcement are met.
- 4.9 Observation: A factual detail noted during an inspection.
- 4.10 Potentially Generic Issue: An inspection finding that may have implications for other licensees, certificate holders, or vendors whose facilities or activities are of the same or similar manufacture or style.
- 4.11 Regulatory Commitment: An explicit statement to take a specific action, agreed to or volunteered by a licensee, where the statement has been submitted in writing to the Department. These are often captured as tie-down conditions in a license.
- 4.12 Requirement: A legally binding obligation such as a statute, regulation, license condition, or order.
- 4.13 Violation: The failure to comply with a legally binding regulatory requirement such as a statute, regulation, order, or license condition.
- 4.14 Intentionally: A person as defined in statute acts “intentionally” with respect to a result or to conduct described by a statute defining an offense when his conscious objective is to cause such result or to engage in such conduct (CGS 53a-3(11)).
- 4.15 Criminal Negligence: A person as defined in statute acts with “criminal negligence” with respect to a result or to a circumstance described by a statute defining an offense when he fails to perceive a substantial and unjustifiable risk that such result will occur or that such circumstance exists. The risk must be of such nature and degree that the failure to perceive it constitutes a gross deviation from the standard of care that a reasonable person would observe in the situation (CGS 53a-3(14)).
- 4.16 Knowingly: A person as defined in statute acts “knowingly” with respect to conduct or to a circumstance described by a statute defining an offense when he is aware that his conduct is of such nature or that such circumstance exists. (CGS 53a-3-(12)).
- 4.17 Careless Disregard: means a situation in which a person acts with reckless indifference to at least one of three things: (1) the existence of a requirement, (2) the meaning of a requirement, or (3) the applicability of a requirement. “Careless disregard” occurs when a person is unsure of the existence of a requirement, the

meaning of a requirement or the applicability of a requirement to a situation, but the person engages in conduct that the person knows may cause a violation, without first ascertaining whether a violation would occur (CGS 22a-6b).

- 4.18 DEEP – Department of Energy and Environmental Protection (Connecticut)
- 4.19 DOE RAP – Department of Energy Radiological Assistance Program
- 4.20 HOO – NRC Headquarters Operations Officer
- 4.21 NERHC – New England Radiological Health Compact
- 4.22 NMED – Nuclear Materials Event Database
- 4.23 NRC – Nuclear Regulatory Commission
- 4.24 RCPD – Radiation Control Program Director
- 4.25 RDO – Radiation Duty Officer
- 4.26 RMP - Radioactive Materials Program
- 4.27 SRCP – Supervising Radiation Control Physicist

5.0 GENERAL

5.1 Responsibilities

5.1.1 Radioactive Materials Program (RMP) Staff

5.1.1.1 Informs the RDO of all radioactive material incidents.

5.1.1.2 Assumes the lead role in immediate response as required to incidents involving radioactive materials and coordinates with the RDO or the Radiation Control Program Director (RCPD).

5.1.1.3 Immediately responds to incidents involving radioactive materials, as directed by the RDO.

5.1.1.4 Assists the RDO or designee with incident response and documentation, including report preparation, as needed.

5.1.2 Radiation Duty Officer (RDO)

5.1.2.1 Notifies the RCPD of radiological incidents.

5.1.2.2 Assigns on-call staff to respond to incidents involving radioactive materials.

5.1.2.3 Coordinates immediate response efforts and investigation of incidents.

5.1.2.4 In coordination with the RCPD and legal counsel, makes decisions to impound radioactive materials found in the public domain.

5.1.2.5 Advises the RCPD whether legal assistance is required.

5.1.2.6 Ensures that notifications are made of reportable events and required reports as indicated in SA-300 "Reporting Materials Events," including immediate, 24-hour, and 5 to 30-day event reporting requirements (linked in Attachment 4).

5.1.2.7 Has the responsibility to ensure that written documentation of reportable incidents is completed and for assuring the quality of the reports to the Nuclear Material Events Database (NMED) within the appropriate time as required by the incident. Abnormal occurrences should be managed in accordance with NRC's Management Directive 8.1 "Abnormal Occurrence Reporting Procedure."

5.1.2.8 If necessary, in consultation with the RCPD, request federal assistance from the NRC Headquarters Operations Officer (HOO) at (301) 816-5100. DOE RAP, NERHC, and EPA utilizing contact information contained in Attachment 2 of CT Agency Procedure - DEEP-RD-5 Duty Officer.

5.1.3 Radiation Control Program Director (RCPD)

5.1.3.1 Final authority, if needed, for radiological incident response activities (conflict resolution).

5.1.3.2 Requests legal assistance, if required.

5.2 Records

- 5.2.1 Records include completed attachments from this procedure, other documents related to incidents and NMED-related documents.
- 5.2.2 Efforts will be made to maintain records primarily in an electronic form utilizing CBRNResponder for radiation survey results and sampling particularly. Those records that are paper will be scanned electronically and may be kept as paper or recycled after determination as to what is best for the particular record and its form for regulatory purposes.
- 5.2.3 Records retention policy for field notes and other documentation is established by Department procedures.

5.3 Prerequisites

In order to respond to incidents involving licensed radioactive materials, staff should be qualified to respond to incidents as an “on-call” staff member as determined by the RCPD.

6.0 PROCEDURE

6.1 Incident Type and Classification

- 6.1.1 **Transportation Incident:** An incident which occurs in association with any activity involving the movement of radioactive materials by a motorized conveyance on roadways (trucks, planes, automobiles, etc.), railway, and waterways. This does not include movement of materials at a facility by forklift, hand-truck, or other transfer method. Such an incident would be considered as a fixed facility incident.
- 6.1.2 **Fixed Facility Incident:** An incident which occurs in association with any activity involving radioactive materials at a fixed location. This would include temporary work sites (soil testing and non-destructive testing of welds), manufacturing sites (thickness gauges etc.), or any other location which does not involve the movement of radioactive materials by a motorized conveyance on roadways as indicated above. This does not include incidents at nuclear power generating stations, independent spent fuel installations, and submarine bases.

6.1.3 Attack: per CGS Sec. 28-1. (1) “Attack” means any attack or series of attacks by an enemy of the United States causing, or which may cause, substantial damage or injury to civilian property or persons in the United States in any manner by sabotage or by the use of bombs, shellfire or atomic, radiological, chemical, bacteriological or biological means or other weapons or processes.

6.2 Initial Notification

6.2.1 When the Department is notified that an incident has occurred, Radioactive Materials Program staff shall obtain as much information as possible to determine the level of response and investigation required. If upon notification of the radioactive materials incident the Department determines that the incident is a major emergency, the Department will contact the applicable agencies listed in this section for assistance. Not all incidents will require an immediate response—rather, some incidents may require 24-hour, next day, 5-day, or 30-day reporting. The appropriate Department response can be ascertained by obtaining as much information as possible and based on the guidance in Appendix A of SA-300 “Reporting Materials Events.”. If simultaneous incidents are being reported, the RCPD or RDO will coordinate the response activities to ensure the incidents are properly prioritized and investigated. The extent and timeliness of investigations shall be commensurate with the potential risk the incident poses to public health and safety or the environment.

Incidents may be received in several ways, including reports to DEEP Dispatch, in-person, phone, email, fax, letter, news media, and/or internet social media. Incidents are screened by RMP staff, initially to determine the level of response required. RMP personnel should use this section as guidance when responding to byproduct, source, or special nuclear material incidents. Radiological material incidents should be recorded on Attachment 1 Radiological Incident Notification Form and the incident reported to the Department and NRC in accordance with Attachment 4 Procedure for Reporting Events.

For major radiological emergencies, the Department should coordinate with other state agencies, federal agencies, and private sector partners in accordance with the DOE RAP, NERHC, and the Environmental Protection Agency utilizing contact information contained in Attachment 2 of CT Agency Procedure - DEEP-RD-5 Duty Officer. Emergencies are

classified in the New England Radiological Health Compact Interstate Radiation Incident Plan.

Significant Events are identified as having generic concerns or issues with a significant potential to impact public health and safety and/or the environment, requiring immediate (within 4 hours) or 24-hour reporting as specified in SA-300 Appendix A. Investigations shall not be delayed and shall be conducted promptly so that necessary actions can be taken to ensure public health and safety and protect the environment.

- 6.2.2 Obtain as much of the following information as possible:
- Caller's name, if by phone, affiliation, and location.
 - Phone number where the informer may be reached.
 - On-scene contact person and phone number.
 - Location of the incident.
 - Overall description of the incident, including any injuries.
 - Indications that radioactive material is involved.
 - Description of the radioactive material, including packaging.
 - Any writing or inscriptions on the materials.
 - Availability of a shipping manifest (transportation incident).
 - Indications of a possible spread of contamination from meter readings, broken source housing, leaking packaging, etc.
 - Other agencies or personnel involved.
- 6.2.3 For incidents involving quantities of Category 1 and Category 2 radioactive materials, ensure the required notifications are made in accordance with the provisions of 10 CFR 37.57.
- 6.2.4 Inform the RDO and RCPD of the incident. If the RDO or RCPD is not immediately available, contact the DEEP Dispatch (860) 424-3333, (which can be reached 24 hours per day, 7 days per week) and have them contact the RDO.
- 6.2.4.1 Criteria for determining the level of response and investigation required follows the reporting requirements listed in SA-300, based on the relative risk to public health and safety or the environment and the factors in 3.2.3.2. The primary responsibility for responding to an incident remains with the licensee. However, the Department may give advisory support and may assist the licensees in diagnosing the situation and determining potential courses of action.

6.2.4.2 Factors that should be considered for determining the appropriate response and investigation include:

- Potential to escalate.
- Location of incident.
- Potential for exposure or contamination.
- Media interest.
- Type of release.
- Involvement of other responders.
- Request for specific type of assistance.

6.2.5 Upon receipt of a notification of an incident, advise the notifier on proper measures to limit exposure and minimize the spread of contamination.

6.2.6 RDO or RCPD shall notify the DEEP Duty Public Information officer by email at DEEP.Communications@ct.gov or by requesting DEEP Dispatch have the Duty Public Information officer contact them. Relative to communications, the RDO or RCPD should consider the following factors:

- Extent of public risk and perception of the risk.
- Extent of media interest.
- Confidence in validity of information reported to the Department.
- Reassessment of the measures that have been taken (e.g., health physics and medical services that have been made available to the public).
- Coordination of information among the NRC, federal agencies, regional partners, and state and local agencies. Ensure that other state agencies and federal agencies are informed of any information to be released to the media or the public.
- Assurance of correctness of information provided to the news media and public.

6.3 On Scene Response

NOTE

- 1 If after investigation, the RDO or RCPD determines that any person is causing, engaging in or maintaining, or is about to cause, engage in or maintain, any condition or activity which, in his judgment, will result in or is likely to result in imminent and substantial damage to the environment, or to public health, the RDO or RCPD may without prior hearing, issue a cease and desist order in writing to such person to discontinue, abate or alleviate such condition or activity. (CGS Sect 22a-7)
- 2 If after investigation, the RDO or RCPD may, without prior hearing, impound the source of ionizing radiation, or contract to impound such source if they determine that (CGS Sect. 22a-158)
 - 2.1 any person is causing, engaging in or maintaining, or is about to cause, engage in or maintain, any condition or activity that, in the commissioner's judgment, will result in or is likely to result in imminent threat to human health or the environment; or
 - 2.2 that there is a violation of the terms and conditions of a permit or license issued by the department that is, in their judgment, is substantial and continuous and it appears prejudicial to the interests of the people of the state to delay action until an opportunity for a hearing can be provided: or
 - 2.3 any person is conducting, has conducted or is about to conduct an activity that will result in or is likely to result in imminent damage to the environment, or to public health for which a license is required without obtaining such license.

6.3.1 If necessary to prevent imminent danger to public health or environment, the RDO may request that a person voluntarily stop or not take an action or surrender a source of radioactive material

6.3.1.1 If the person about to engage in an activity that the RDO determines may result in imminent danger to public health and safety or the environment and does not voluntarily comply with direction from the RDO, then the RDO should contact the RCPD and request the department pursue a formal cease and desist order or impoundment order.

6.3.1.2 The RCPD shall contact DEEP Office of Legal Counsel to coordinate such orders.

6.3.2 When possible, a minimum of two people should provide immediate response to a radiological incident.

6.3.3 The following equipment should be obtained and transported to the incident scene for immediate response:

- Appropriate Personal Protective Equipment (PPE)
- Appropriate survey instrumentation,
- An instrument capable of field identification of unknown isotopes,
- Personally assigned dosimetry,
- Cellular phone,
- Other instruments and supplies, as necessary.

6.3.4 Responders should use CBRNResponder to record radiological survey data and sample results.

6.3.5 Site approach for immediate response team:

- Don appropriate PPE
- Approach the incident site/material from upwind.
- Turn on exposure rate instrument and electronic personal dosimeter before approaching the incident site.
- Obtain current information from the Incident Commander or the on-scene personnel if one has not been established.
- Coordinate response efforts prior to approaching the material.
- Ask for a shipping manifest if applicable.
- Establish an exclusion zone as specified in the Emergency Response Guide (ERG) or at 2 mR/hr around the material if not already done.
 - ✓ Note that in worse incidents, like a radiological dispersal device or a nuclear detonation, the RDO may direct a 10 mR/hr or 10 R/hr exclusion zone.
- Determine who may enter the exclusion zone and under what conditions.

6.3.6 Document the following, as it occurs:

- Date and time of all major activities related to the incident.

- Model and serial numbers of all instruments used (if not provided within CBRNResponder).
 - Calibration date of all instruments used (if not provided within CBRNResponder).
 - Names of responders.
 - A physical description of the incident site.
 - Location or orientation of any materials.
 - Background radiation levels.
 - Survey results.
 - Amount of material present.
 - Any markings or inscriptions associated with the material.
 - Disposition of the material.
 - Names, phone numbers, and addresses of all individuals involved, for follow-up when performed.
- 6.3.7 Determine if material needs packaging. If the material must be bagged, double bag the material. Survey the outer surfaces of any packaging for contamination prior to transport and take appropriate precautions should external contamination be measured.
- 6.3.8 After the material has been safely packaged or ensured to be in safe condition, do the following:
- Determine the best location for temporary storage.
 - Ensure that decontamination issues are addressed.
 - Initiate attempt to locate owner of material.
 - Contact the RDO and RCPD (primary) or designee (secondary) for direction and authorization for management of the material (see Attachment 3 **Impoundment Guidelines**.)
 - Notify the 24-hour DEEP Dispatch phone line at 860-424-3333, if appropriate.
 - If no owner can be found, notify the RDO and RCPD and inquire whether or not to impound the item. Disposal options will be investigated at this time.
- 6.3.9 Unless being transported in a state vehicle, materials being transported for analysis or storage must be packaged to meet Department of Transportation requirements and may require Connecticut Department of Transportation permitting.

6.4 Report

- 6.4.1 The RMP Staff assigned to the incident should prepare a report within 30 days documenting all information gathered, the disposition of the material, and a list of all the parties involved. The report is required for all incident responses, including phone consultation for reportable incidents. If a report cannot be completed within 30 days, the RCPD or designee may approve an extension.
- 6.4.2 The report should be prepared utilizing the standard Radiation Division form entitled “Radiation Control Incident Report” in Attachment 1.
- 6.4.3 Provide a copy of the report to the SRCP and RCPD.
- 6.4.4 The SRCP shall assure the quality and completeness of the report and ensure that a copy of the report, analysis results, and all notes and related paperwork are properly filed in accordance with SA-300. This report and any subsequent follow-up reports should be utilized to forward data to NMED and to the NRC in accordance with SA-300 “Reporting of Material Events” as well as any other federal, state, or local agency, as necessary.
- 6.4.5 Input incident data to the local NMED and forward event reports to the NRC, as necessary. For more information on reporting events, see NRC SA-300.

6.5 Follow-up

- 6.5.1 In consultation with SRCP and RCPD, determine if any whole-body counts, bioassays, or personnel dose determinations are warranted, and if medical assistance is required or referral to Oak Ridge Radiation Emergency Assistance Center (REAC/TS) for analysis is necessary. Additionally, the RCPD may contact the Yale bio dosimetry lab for assistance such as chromosomal dicentric analysis for dose estimations. See NRC Inspection Manual Chapter 1360 “Use of Physicians and Scientific Consultants in the Medical Consultant Program” for guidance.
- 6.5.2 In consultation with SRCP, determine if training or information for any individuals involved in the incident is warranted.
- 6.5.3 In consultation with the SRCP, determine the need for a follow-up inspection and/or any enforcement actions against the licensee. This incident should be addressed during the next routine inspection. If it is

determined that enforcement actions are required, refer to RCP 902.1 Enforcement, Escalated Enforcement, and Administrative Actions.

- 6.5.4 Ensure a copy of the incident report is in the licensee file and make notifications to the appropriate RMP staff, as necessary.
- 6.5.5 Make notifications as appropriate to federal and state agencies specified in section 6.6, including the NRC and NMED within the appropriate time period of any new information and status of event including final close of the event.
- 6.5.6 In consultation with RMPM, determine the need to notify other licensees of problem if known or possible general fault that could affect those licensees.
- 6.5.7 If a cease-and-desist order was issued or a source impounded, RCPD shall coordinate with DEEP Office of Legal Counsel to ensure the required 10-day hearing is conducted.

6.6 Communicating Events to the Appropriate State and Federal Agencies

- 6.6.1 U.S. NRC Region 1, 2100 Renaissance Blvd., Suite 102, King of Prussia, PA 19406-2713 (610) 337-5000.
- 6.6.2 NRC Headquarters Operation Officer (HOO) (301) 816-5000.
- 6.6.3 U.S. EPA (617) 918-1111 or in the New England States (888) 372-7341.
- 6.6.4 Oak Ridge Institute for Science and Education, Radiation Emergency Assistance Center/Training Site (ORISE REAC/TS) (865) 576-1005. SRCP shall determine when there is sufficient information to close out the allegation and indicate in the investigation report or licensee response letter satisfactory response.

IMMEDIATE RESULTS:

SECONDARY ACTIONS:

SECONDARY RESULTS:

FOLLOWUP ACTIONS:

FOLLOWUP RESULTS:

SUBMITTED BY: _____

REVIEWED BY: _____

FINAL DISPOSITION:

ATTACHMENT 2

RADIOLOGICAL INCIDENT RESPONSE QUESTION AND ANSWER SHEET

What is a radiological incident?

A radiological incident is an emergency involving radioactive materials. Examples of radiological incidents include situations where radioactive materials are lost, stolen, or involved in a transportation accident. In most cases, radiological incidents can be successfully resolved by emergency responders with state assistance.

What state assistance is available to respond to a radiological incident?

The Connecticut Department of Energy and Environmental Protection, Radioactive Materials Program (RMP), is available on a 24-hour basis to support and advise emergency responders during an incident involving radioactive materials. RMP emergency response resources include highly trained personnel and specialized radiation monitoring equipment. RMP staff can be quickly dispatched to provide on-site assistance at the scene of a radiological incident.

How are radioactive materials regulated to minimize public risk?

Radioactive materials are stringently regulated by state and federal government agencies by licensing or registration. Devices and products containing radioactive materials are required to incorporate safety features that minimize the exposure risk to the public from a radiological incident.

What should I do if involved in a radiological incident?

Remain calm. Follow instructions given by on-scene officials. Connecticut Department of Energy and Environmental Protection staff will quickly assess the situation and recommend any further actions. Most radiological incidents do not result in harmful levels of radiation exposure to the public.

Where can I get more information?

For more information on radiological incident response or health risk from exposure to radiation or radioactive materials, contact:

Connecticut Department of Energy and Environmental Protection

Radioactive Materials Program

(860) 424-3029 (normal business hours)

(860) 424-3333 (after hours dispatch)

ATTACHMENT 3

IMPOUNDMENT GUIDELINES

Impoundment Authority (22a-158) Stop Authority (22a-7)

Management will consider the following questions before approving a request to impound radioactive materials.

Regulatory Control:

- Are the radioactive materials under the direct control and responsibility of a licensee?
- Are the materials in a controlled location?
- Are the materials directly and negatively impacting public health and safety?
- Is there a possible public perception problem with the current location?

Physical/Chemical Form:

- What is the isotope and physical/chemical form of the material?
- Are other hazardous or explosive materials involved?
- What is the activity of the material?

Physical Condition:

- Are the materials intact, crushed, leaking, or damaged in some way?
- Are the materials concentrated or dispersed over a large area?
- Are the materials separate or part of a larger device?

Amount:

What is the volume of the material?

Transportation:

Can the material be transported safely?

Waste Management:

Does managing the material involve simple storage or is any processing involved in disposing of the materials?

Alternatives:

- Are there any safe and reasonable alternatives to the State impounding the material?
- Is there a temporary storage location and responsible party available?

ATTACHMENT 4 MATERIAL EVENT REPORTING FOR THE AGREEMENT STATES

The Nuclear Regulatory Commission has developed a Handbook on Nuclear Material Event Reporting for the Agreement States and an accompanying procedure SA-300.

For determining if an event is reportable, required reporting timelines, and reporting mechanisms utilize the most recent copy of SA-300 Reporting Material Events and the Handbook on Nuclear Material Event Reporting for the Agreement States at the following web address:

<https://www.nrc.gov/reading-rm/doc-collections/nmss-procedures/state-agreement.html>

Reports of events should be made in accordance with RCP 904.3 Nuclear Materials Events Database (NMED) Input including reports to the NRC Headquarters Operations Officer at 301-815-5100. If reportability cannot be determined, the RCPD will contact the NRC for determination.