

Department of Energy
Richland Operations Office
P.O. Box 550
Richland, Washington 99352

00-ESD-071

MAY 24 2000

Dr. L. J. Powell, Director
Pacific Northwest National Laboratory
Richland, Washington 99352

Dear Dr. Powell:

**CONTRACT NO. DE-AC06-76RL01830 – RL POLICY AND PROCEDURE FOR USING
RADIOACTIVE MATERIALS IN TRAINING AT HAMMER; RADIOLOGICAL WORK IN
THE 600 AREA**

During the Hanford Radiological Control Forum (HRCF) meeting on April 12, 2000, Fluor Hanford, Inc. (FHI) discussed a policy and procedure for using radioactive material in training at HAMMER, an FHI-operated facility. For cost efficiencies, the desired approach was to authorize each DOE contractor to work under its own Radiation Protection Program (RPP) while using radioactive material for training at HAMMER. In the meeting, a potential conflict in contractor RPPs, which would potentially inhibit implementation of the desired outcome, was discussed. Additionally, during the HRCF meeting of May 10, 2000, the contractors discussed work in the 600 Area, also managed by FHI, where for cost efficiencies it may be desirable to permit another contractor to work under their own RPP while inside the area.

PNNL-11963, Revision 1, "Pacific Northwest National Laboratory Radiation Protection Program, Implementation of 10 CFR 835," Section 3.1, "Applicability and Scope," specifies "This RPP applies to on and offsite DOE radiological work activities performed by both PNNL staff members and any subcontractor employed by PNNL. Other Hanford contractors or their subcontractors will comply with PNNL's RPP when conducting DOE work in PNNL-controlled facilities. Similarly, PNNL staff will comply with the requirements of that contractor's RPP when performing DOE work in another Hanford contractor-controlled facility or for another Hanford contractor."

The Code of Federal Regulation, 10 CFR 835.101(b), specifies "The DOE may direct or make modifications to a RPP." To support RL and contractors' desire for cost effective radiation protection for control of radioactive materials used at HAMMER and for radiological work in the 600 Area, I am directing the following: The control of radioactive materials for use in training at HAMMER shall be in accordance with the attached "Policy and Procedure for Using Radioactive Materials in Training at Hammer." Additionally, for the 600 Area where there is formal agreement between FHI and PNNL that it is appropriate, such work shall be performed under PNNL's RPP. This modification is effective with the issuance of this letter. During the next revision of the PNNL RPP, please clarify the RPP to allow work to PNNL RPP in another contractor's facility where there is formal agreement between the two contractors and it is approved by DOE.

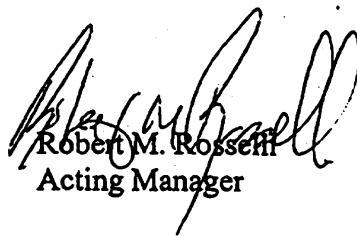
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If you have any questions, please contact me, or your staff may contact Paul Kruger, Assistant Manager for Science and Technology, on (509) 372-4005.

Sincerely,



Robert M. Rossen
Acting Manager

ESD:BMP

Attachment

cc w/attach:
S. D. Dossett, PNNL

POLICY AND PROCEDURE
FOR USING RADIOACTIVE MATERIALS
IN TRAINING AT HAMMER

Responsibilities:

- Fluor Hanford, Inc. (FHI), operates the HAMMER facility and maintains the overall responsibility for health and safety of the facility.
- FHI has the authority and responsibility to stop radiological work activities at HAMMER for any of the following reasons:
 - Inadequate radiological controls; and or
 - Radiological controls not being implemented
- FHI maintains responsibility for control of radioactive materials at HAMMER that are outside the scope of a training provider's license or Radiation Protection Program (RPP).
- The Office of Training Services and Asset Transition (OTS), in conjunction with the Office of the Assistant Manager for Safety and Engineering (AMSE), maintains responsibility to approve the use of radioactive material at HAMMER in accordance with a license for use of the specified radioactive material from the Nuclear Regulatory Commission (NRC) or an Agreement State of the NRC or in accordance with an approved contractor RPP which covers the activity.

Policy:

- The use of radioactive materials for training purposes at HAMMER will only be allowed after considerations have been given to alternative methods of simulating or generating the necessary effects needed for the training scenario. This decision is the training provider's responsibility.
- The training provider must have either an RPP approved by the U.S. Department of Energy (DOE), which covers the activity or a license for use of the specified radioactive material (type and amount[s] of radioactive material) from the NRC, or an Agreement State of the NRC.
- HAMMER may provide an appropriate locked storage area for the radioactive materials, if required.
- Any other radioactive materials brought into the HAMMER Facility, not covered by the training provider's RPP or license, will be controlled in accordance with the Fluor Hanford Radiation Protection Program unless it is exempt from the regulatory requirements of 10 CFR 835.

- For radioactive materials brought into the HAMMER facility under a license from the NRC or Agreement State of the NRC, AMSE, in conjunction with OTS, will review the training provider's RPP to ensure it provides adequate safety.
- The training provider will be responsible, under the applicable license or RPP, to maintain appropriate radiological controls prior to, during, and after the training activity. The training provider will be responsible under his license or the applicable RPP for safe transportation, storage, use and control of the material. This includes any required dosimetry, monitoring, posting, and surveys.
- If there are any mishaps with execution of this responsibility, the training provider will be responsible to meet any reporting, cleanup, investigating, etc., required by the licensing agency and DOE.
- All liability associated with use of the radioactive material is the responsibility of the training provider as set forth in the user agreement or contract.
- Only radioactive material in the form of sealed sources as defined in 10 CFR 835.2 or dispersible radioactive material with a half-life equal to or less than 24 hours and an isotopic activity less than the corresponding value provided in Appendix E of 10 CFR 835, may be used at HAMMER.
- The dose from any radioactive material will be maintained as low as reasonably achievable (ALARA) and will be below the level allowed for the general public as specified under the applicable license or RPP.
- Adequate records will be maintained to document the use and removal of the radioactive material to support release of the HAMMER facility at the end of its life-cycle. The training provider at the completion of training sessions will provide this documentation to FHI for archiving purposes.
- The DOE Richland Operations Office (RL) and FHI reserve the right to audit the training and compliance with this procedure at any point prior to, during, or after completion.

Procedure:

The training provider will submit a training plan to the DOE OTS for approval prior to beginning any training activity. This plan must address/describe all of the elements listed below:

- the type(s) and quantity of radioactive material(s) to be used in the training;
- how it will be used in the training activity;
- if the radioactive material is not a manufactured sealed source, how the material will be contained and controlled to ensure no spread of contamination;

- how and where the radioactive material will be controlled and stored when not in use;
- the radiological controls that will be in use prior to, during and after the training to ensure control;
- the provider's authority (licensing authority) for use of this radioactive material and who, by name, will be the provider's responsible person while the radioactive material is at HAMMER;
- the rationale for the necessity to use radioactive material, the other options that were evaluated, and why these were not acceptable; and
- records to be provided to RL to document the use of the radioactive material and its removal from the HAMMER facility.

ESD:BMP
5/19/00