

**Radiological Control Coordinating Committee (RCCC)
Meeting Minutes
April 18-19, 1995
Las Vegas, Nevada**

I. Distribution of Draft Minutes

The RCCC meeting convened at 8:30 a.m. on Tuesday, April 18, 1995. Draft minutes of the February 28-March 1, 1995 meeting were distributed for review with comments and approval scheduled for April 19. **Attachment 1** is the list of attendees. A list of action items provided to the members on May 18, 1995, is **Attachment 2**.

II. Discussion of RCCC Comments to Infrastructure Evaluation Team Report that were provided to EH

The Chair stated a wide range of suggestions were received. The Chair took all suggestions and developed the RCCC position: This position was faxed to all the members for comment before signature. EH-3 was concerned about the short time to incorporate comments into the recommendations of the strategic alignment team. The recommendations to Secretary O'Leary are due on May 3, 1995. The Chair provided a brief history of the creation of the team that reviewed the DOE Infrastructure.

III. Status of ORPS Report to EH

Discussion centered on making some modifications to the report, mostly in clarifying responsibility for the EH actions.

IV. Status of RPP Review Team Report Format

The committee discussed that EM-25 has had one report already approved. The group agreed on moving forward with the format distributed at the last RCCC meeting.

V. EFCOG Radiological Control Managers Meeting

The next EFCOG meeting is scheduled for May 23-24 at the Sahara Hotel in Las Vegas, Nevada, and RCCC members will be invited to attend. This is not a DOE-sponsored meeting, but EFCOG provides the room and agenda items. For convenience the next RCCC meeting will follow EFCOG on May 24-25. (This may change because of the Memorial Day Holiday.) (*ACTION: The Chair will send notice to RCCC members.*)

VI. EH Review of RCCC

The RCCC was requested to provide all comments on infrastructure prior to formulating a final position. This request was pushed back by the RCCC Chair and dropped by EH. Ollie Lynch has completed all interviews and a draft report of the RCCC functions. EM-25 said the conclusion should be positive with respect to the RCCC.

VII. RPRIMS

ER-8.2 distributed a one-page survey to identify needs and opportunities for improvement of the Radiation Protection Requirements Implementation Management System (RPRIMS). This is **Attachment 3**. Discussion centered on whether RPPs could be sent in RPRIMS.

(ACTIONS: RCCC members requested to complete survey or give to someone for them to complete.)

VIII. Copies of Revised RadCon Manual - Draft 2

These are available on the All-In-One system. The Chair distributed a copy to the Committee which is **Attachment 4**. This item is scheduled for discussion on the second day of the meeting. EH-52 stated RCM would be reviewed as a technical standard, and the review process for technical standards would be used (e.g., 60 days). However, the Draft RCM is available now for informal review.

IX. Draft Optimized Implementation Of Rules And Orders

DP-31 distributed **Attachment 5**, “Draft Optimized Implementation Of Rules And Orders” to request Committee’s input. Document emphasizes prioritization. Committee decided to place on April 19 agenda to provide some opportunity for review.

X. Review of DNFSB Recommendation 91-6

Background: Committee of Don Knuth, Randy Scott, Joe Fitzgerald was formed to review where DOE was in relation to implementing 91-6. The DNFSB is concerned that the 1993 report was signed out in 1995.

(ACTION: Agreed the Committee will prepare annual report on RadCon status that is used in response to 91-6 in a more timely manner, AL will provide input for annual report to EM.)

Chair stated there was a subsequent meeting with staff on several issues, including training, particularly RadControl Technician, completion at Livermore, Rocky Flats and Mound. Another issue was the overall management with the DNFSB wanting a single point of contact. OAK reported RCT training at Livermore will not be completed for another year and that more employees will need training. EM-25 reported on final list in annual report. Livermore is fairly clear, Mound doesn’t venture to say the number trained, but training is taking place. Ohio reported they have qualified technicians. DNFSB is looking at RPP review process. They are looking at RPPs for Fernald and Livermore as well as review criteria.

(ACTIONS: OAK will provide ETEC training information; the Chair will take responsibility for AL’s portion; EM-25 will distribute report to committee for verification.)

XI. Exemption Status

Committee members provided updated status and agreed on concurrence/approval chain.

Side Issues: Hanford exemption request is being worked at a lower level since Richland Operations Office did not concur. Clarification should cover this topic. Fernald sent their requests directly to EH (no Ohio Field Office or EM involvement).

Ohio reported West Valley had no exemptions. The Chair stated Mound had temporary exemption requests for nuclear accident dosimetry. DOELAP is temporary, back in testing phase, then on-site visit. Plutonium bioassay should be covered by clarifications from EH. (ACTION: EH, EM and AL will work with OH on closure of dosimetry reports.)

Chicago reported the following exemptions. (1) Brookhaven posting of “Grave Danger” in a patient treatment area - CH will forward to ER and NE, who will submit to EH. (2) Painting of shield blocks - Working on narrowing scope. (3) Most Restricted DAC presents a worker communication issue since they don’t want to post areas they really don’t have to post. ER-8.2 worked on this issue with CEBAF. EM-25 reported the arguments are similar. Most other issues are being handled through the amendment and/or clarifications, CH reported.

There was one training issue with the Notre Dame Laboratory. They cannot afford to train a technician to the requirements of the rule. Chair said the KC-Plant faces the same issue since they have one technician. However, this position has been upgraded to a professional since the individual has completed his bachelor’s degree.

Nevada had one exemption request, “Posting of Radiological Areas” where the purpose of the activity is locating the radioactive sources. The request was sent to DP, who fully supports the exemption. Presently DP is reviewing and will submit request to EH.

Savannah River has two requests. 1) Historical Data - How much you have to do to obtain it. (A clarification issue.) 2) Instrumentation on 401(c). (Clarification issue). Review Team Report will forward requests with RPP, but state that exemption requests will be withdrawn upon receipt of official DOE/EH clarification.

Idaho reported no exemptions.

Oakland reported Livermore is sending forward 5 exemptions. (1) A “Danger” posting for high radiation and contamination and (2) color requirements for the sign. “Danger” pending. (3) Testing for GERT and (4) & (5) retraining. (2 requirements). EH-52 is working these issues.

ETEC-DOELAP: The Chair questioned whether this is a clarification issue. OAK stated ETEC has an “A Clause” contract and therefore requires an exemption to use NVLAP. There is discussion on requesting an exemption to the entire part, but OAK is unlikely to support this. They have informed the contractor of this position.

Rocky Flats had no exemptions. They reported a difference between the requirements of 1304(b)(4) and Part B, Section 4 of DOE 5480.11.9.q.3a regarding locations requiring criticality dosimetry. The committee debated the definition of “not a controlled area ...” vs. “Not an area in a location ...” RFO will clarify the definition in the RPP. Also, the term “inner locations” needs clarification. RFO may ask for help from EH. Nevada said the term “criticality alarm system” also needs to be defined.

RFO asked for a definition of “location” because it affects PNADs. Committee discussion followed, regarding interpretation to the order 5480.24 and the purpose of a PNAD. The bottom line is the RFO will define terms in the RPP after discussing with their criticality people.

Richland had one exemption for 404(b) which was not supported.

Yucca Mountain reported no exemptions.

Oak Ridge had three exemption requests (FUSRAP, ORISE, and Weldon Springs) awaiting DOE on DOELAP. Martin Marietta has two issues: CAMs and historical dose. Martin Marietta doesn't consider the clarification on historical dose provided by OR addresses their concern and may request a temporary exemption. The process for a CAM issue is for Oak Ridge to forward a request to DP. The process for a historical dose issue is for Oak Ridge to forward a request to ER. FUSRAP: The extent of requests is presently being determined in light of a review of clarifications. A request regarding radon is probable. Any requests will be forwarded by Oak Ridge to EM.

Albuquerque reported on 7 items.

- 1) ITRI will have an exemption request on radon because of their radon generator. The request will be forwarded by AL to ER. AL will forward clarifications on Plutonium bioassay and instrument calibrations in hopes the requests on those two issues will not be pursued.
- 2) Pantex, Nuclear Accident Dosimeters. Pantex is requesting an exemption for nuclear accident dosimeters. An exemption on a similar requirement in DOE Order 5480.11 was approved by EH. AL will forward request to DP.
- 3) UMTRA has one exemption request on radon and the ten percent survey program for release of trucks to controlled areas. AL will forward the request to EM.
- 4) GJPO has one exemption request on radon. AL will forward this to EM. Their instrument calibration issue should be handled by clarification.
- 5) LANL has three requests, one on radon (which is temporary); the second on Plutonium Bioassay (which needs clarification); and the third about I-125/129 (which was withdrawn).
- 6) SNL, KCAO, and WIPP have no requests.
- 7) TSD/Ross: AL is preparing a temporary exemption from the whole 10 CRR 835 until the rule can be amended to specifically exclude transportation safeguard activities.

The Committee agrees a clear path is set to resolve the above exemption requests. EM-25 stated there are probably 25 issues total. Nevada asked about requests from soil contamination. EH-52 stated that pertinent information was contained in the RL clarification.

(ACTION: Nevada requested a copy and EH-52 will fax a draft the EH response to the WHC of exemption requests to all committee members.)

XII. Update on Clarification from EH

The Chair opened the floor for discussion or clarification of any areas of concerns. EH-52 provided draft copies of seven Radiological Control Technical Position for review and input from RCCC members (**Attachment 6**). NE-44 reported some Radiation Protection Programs are not acceptable because actions are not clearly defined as to when the contractor is not in compliance. Details are provided in discussion below on the status of individual RPPs.

(ACTION: AL will provide an update from SNL and Mound and LANL RPP information to NE.)

XIII. Status of RPP Reviews - RCCC Operations/Field Office Representatives With Discussion By Program Representatives

AL's monthly RPP update, **Attachment 7**, was distributed to the committee and followed by discussion from the Chair. EM-25 reported the comments on 7 RPPs are still open. AL and EM-25 will discuss the open comments to try to come to closure.

At this point the approval process for RPP's was discussed. RL provided their method, which is as follows: The team leader would provide two copies of each RPP to team representatives at HQ. The team proposed the officers approve the plan using the RCCC representatives to coordinate it. One letter would go out to the "-1's" of DP, ER, EM, NE reporting what is being sent. The team report documenting their deliberations/comments would be attached.

EM requested individual CSO signatures vs. a four signature memo, which would require more coordination at HQ than resources would permit. The desire is for each operations office to get timely responses.

The Chair, with input from the RCCC, requested DP to formally document their position on approving RPPs for facilities in transition (e.g., SR, INEL, RL). Somebody at DP-1 level needs to make the decision.

The following process was agreed to for submission of the RPP:

- A multi-addressee letter will be sent by the Operations/Field Office Manager forwarding the RPP and review team report to each cognizant secretarial office as determined and coordinated by the RCCC (See discussion under Section IV). A copy will be sent to the RCCC representative in the cognizant secretarial offices.
- Each CSO will individually provide approval to the Operations/Field Office Manager.
- The Operations Office Manager will send approval memo to the contractor with copies to all CSO's involved in approval process, and an official package to the Docketing Office at HQ.
- Docket File.

FOR NEXT MEETING: Status report to committee on CSO's approval status.

Richland: Their review process is finished. The document is presently in the Manager's office for concurrence and is due to be completed the week of April 24. (*ACTIONS: RL will send copy to Chair; DP will write letter stating DP does not need to approve RL RPP. Update will be provided, (Attachment 8).*)

Savannah River: Their review process has been completed; the package is in concurrence draft within AM offices. All contractor CEO's have signed off and the plan will be sent May 1 (**Attachment 9**).

Idaho: Their review process is nearly complete; but some outstanding issues need to be resolved with EM. A red-line copy will be received during week of April 17, with the final plans to be sent May 1 (**Attachment 10**).

Oakland:

- DP has visited Livermore twice. One more trip will be made to finish the review. Five exemption requests are coming with no final date named at this time. NE has not been involved in the process to date, but information will be sent to them.
 - ETEC is in the process of responding to comments. They are scheduled to receive the revised RPP by May 12. Their funding issues have been resolved. A discussion with the committee about whether approval is required from Energy Efficiency and Renewable Energy (EE), which funded part of the program, is planned. No EE funding goes to DOE activities involving ionizing radiation; therefore, EE is not required to approve.
 - LEHR: Comment responses are expected by April 28. The RPP is being revised.
 - LBL: The RPP is being revised and should be returned the week of April 24.
 - Stanford Linear Accelerator Center: Completed their responses to comments. A revised RPP expected by April 30.
- Oakland update completed, given as **Attachment 11**.

Rocky Flats:

- RFETS: Comments have been issued and resolved; the RPP has been revised and is being signed out. There is reasonable assurance that the program will be implemented by end of 1995 (**Attachment 12**).
- National Conversion Pilot Program (NCP): This Includes privatization through EM-64. RFO asked for clarification from HQ on this matter. This may be an issue if the project is considered an "existing project" versus a "new activity." RFO has been working with NCP and has received a draft RPP. Also, there is no contract, but a memorandum of agreement is in place. General Counsel will decide on the applicability and an update will be resent.

Oak Ridge:

- Continuous Electron Beam Accelerator (CEBA) is in initial review. The comment resolution is nearly complete.
- Environmental Restoration Program: Comment resolution is nearing completion.
- FUSRAP comment resolution is nearly complete. Exemptions are an issue. (*ACTION: OR and EM will work with Program Person at FUSRAP and conduct a teleconference with all parties to resolve RPP.*)
- Environmental Restoration and Waste Management (ERWM): A decision has been made to prepare a memorandum of understanding to allow ERWM activities to be performed under MMES RPP.
- MMES and construction at K-25; ORNL; Y-12: RPP legal assumptions have to be resolved. Appropriate changes are being made and should be completed by the week of April 24. NE is unable to presently concur and will meet with OR to resolve the outstanding issues. Some activities at the Gaseous Diffusion Plants will require an RPP; and the scope of the MMES RPP will be revised to incorporate these operations.
- Oak Ridge Institute for Science and Education (ORISE): OR representatives met with ORISE recently and they are a little behind on comment resolution. The limited staff is also responsible for other issues, such as moving six or seven 500-Ci sources.
- Weldon Spring Site Remedial Action Program: Comments are to be sent the week of April 17. They're on time and on board, and waiting for EH clarification on radon.

- Johnson Controls: They recently identified an issue that will be covered by a memorandum of understanding to allow coverage under OR's RPP.

(See Attachment 13)

Chicago:

- Ames Lab: CH might have to revisit to resolve comments in a timely manner.
- Argonne National Laboratory - East: A response to comments is expected April 21. NE needs to determine if their review is needed.
- Environmental Measurements Lab has responded to comments. EM-25 and ER-8.2 have approved.
- Fermi National Accelerator Lab: The review team concurs with Fermi's resolutions and EM-25 and ER-8.2 have approved.
- New Brunswick Lab: The comments are in the mail to EM-25 and are OK so far. EM-25 has not seen the contractor response.
- Notre Dame Radiation Lab: The review was submitted by the lab. Comments are going back. CH is ready to go with the report. December 21 is date for the RPP submission.
- Princeton Plasma Physics Lab will submit comments formally.
- Argonne National Laboratory - West is distributing resolutions to comments to the review teams.
- Brookhaven National Laboratory is distributing comment resolutions to the review teams.

(See Attachment 14).

NOTE regarding Argonne National Laboratory - West and Brookhaven National Laboratory: NE has been dissatisfied from the beginning with these RPPs, particularly with regard to how the contractor will achieve compliance with the requirements not currently implemented (i.e., the implementation plans). The Review Team considers that for BNL, the review team's comments on the implementation plans have been adequately addressed. The RPP for ANL-W does not have implementation plans because all the requirements are in full compliance. The Review Team will not ask for the RPPs to be rewritten because they consider that the contractors followed the guidance provided by the RIWG.

DAY 2

XIV. Comments on Minutes

The Nevada Operations Office raised an issue of whether contractors should maintain employee records, such as for training and dosimetry, and for services provided by other contractors. The general consensus was that as long as management had access to the employee records, it did not matter which contractor maintained the records.

Another issue discussed was the idea of getting some contractors to rewrite their RPPs into an acceptable format. Reduced funding and competing priorities are severely impacting the development of acceptable RPPs. The review team is working issues; also, DP and EM are meeting with NV after the RCCC meeting to address these concerns.

The Chair received comments on the draft minutes from the previous meeting and will revise the minutes accordingly.

XV. Recent Request From Defense Board (Draft)

The Chair discussed a request from the DNFSB staff to EH on the use of performance indicators. The request and EH draft response are attached (**Attachment 15**).

EM-25 said RL has a quarterly report on Performance Indicators. The Chair stated we have a metrics report, but it would take time to show how contractors use this information. EM-25 believes the DNFSB would accept steps on how the indicators are being used. RFO asked how these performance indicators tie into the Quarterly Report for EM-1 and recommended they be tied in. Committee discussion centered on value-added information, meaningful measures and performance. It was decided that the May EFCOG meeting would be used to request contractors for the information, which would be brought by RCCC members to the Health Physics Society meeting in July.

(ACTIONS: EM-25 will use this information to request feedback and discuss at the EFCOG meeting in May; the Chair will discuss the oversight database with Ollie Lynch.)

XIII. Status of RPP Reviews - RCCC Operations/Field Office Representatives and Program Representatives. (Cont.)

Nevada: NV has one RPP with 10 parts (an introduction and 9 appendices, one for each contractor). The original submission was not responsive to all the requirements of the rule. Comments were provided on February 10, 1995, including comments from DP & EM. This has received 4 revisions on appendices. Most of the comments have been addressed by revisions of the RadCon Manual. NV is working on the crosswalk matrix (**Attachment 16**).

Yucca Mountain: One issue with scope is being resolved with General Counsel. YMSCO expects the RPP to be approved by the end of May. There is no EM or DP involvement; and the Office of Civilian Radioactive Waste Management (RW) owns and has delegated approval authority to the Yucca Mountain Site Characterization Office.

Ohio:

- Fernald: The reviews are done, comments resolved, and the RPP is ready to submit to EM.
 - The West Valley Demonstration Project RPP is already approved.
 - Mound - Revised RPP. Action: OH will send the Chair a copy; NE and EM will also receive a copy. OH stated West Valley and Fernald are offering services and support to Mound. There is a real team effort in progress. NV is also providing support, bioassays.
- (See **Attachment 17**).

In the fall, the EH Tactical Assistance Organization will follow-up with project implementation. The EH Tactical Assistance Organization is able to fund short (2-3 days) trips with groups of 3-4 people in an effort to provide more resources.

The Chair reviewed Table 1 of the EM Progress Report to verify approval CSOs and outstanding actions (**Attachment 18**).

- AL: DP will not need to approve the Pinellas RPP, and NE will need to approve the SNL RPP. TSD/Ross needs to be added to list to reflect the need for an exemption.
- CH: NE will not need to approve Argonne - East RPP.

ID: DP and ER will not need to approve the INEL RPP.

NV: DP & EM will not need to approve the YMP RPP; RW is the program office.

OH: DP will not have to approve Mound RPP.

OAK: Remains as written.

OR: #31, 32, 33 are OK. #34 combines with #36 (#34 disappears).

#38.5 Johnson Controls will go into #35. MOU for #35. Paducah and Portsmouth are added to #34 and #35.

RFO: DP dropping out; only EM approval. National Conversion Pilot Program being worked, would be an RPP if required.

RL: Battelle has EM approval. #41 and #43 dropped out; #42 is OK.

(ACTION: DP will issue a memorandum with regard to DP approval of facilities in transition (Pinellas; Idaho - National Energy Lab; Mound; RFO-Environmental Tech Site; and Westinghouse-Richland).)

April updates are completed by AL, OAK, OR, RFO and SR.

(ACTION: CH, ID, NV, Yucca Mountain, will send updates to be attached with these meeting minutes. RL will resend update.)

XVI. Discussion of RadCon Manual and 10 CFR 835 Proposed Revision

OAK raised the issue of how to handle “shall” requirements of the Radon Manual.

EH-5.2 said they were hortatory, meaning to exhort people to do something.

The Chair stated “shall” in the RadCon manual and 835 “shall” should be the same. OAK asked if “shall’s” not covered in 835 are now non-prescriptive. The Committee discussed the meaning of “shall” and whether comments had to be submitted with those from Order 470. EH-5.2 said there was no-tie in with Order 470. There will be 60 days to comment on the draft RadCon Manual once it is issued in the Technical Standards process. Everyone presently has the “heads up” version. ER-8.1 said there are only 28 places where “shall” went to “should.”

EM said for the draft RCM they provided the following: 1) a cross reference for 23 RPP’s; 2) a list of inconsistencies; 3) the needs for Article 371 extension and technical equivalencies; 4) a cost article by article; and 5) the 10 CFR 835 and 10 CFR 20 comparisons. RFO is concerned there could be a major impact on contractor RPPs if the RCM is dramatically changed because so much of the RPP relies on the RCM.

RL brought up a side issue of **Attachment 19**, “Policy/Standards Process Improvement.” The Committee discussed a worker protection documents diagram. Committee discussion centered around the reason why two documents exist with one going beyond the requirements. EH-5.2 provided a brief history. Discussion also centered around the RadCon Manual providing the “how to” on accomplishing the mission. Concerns were raised about the proper balance and the “mandatory standard” status of the RCM.

EH-5.2 said amendments to 835 are moving along slowly. During the last discussion with General Counsel, EH-5.2 was not sure how General Counsel would handle any rule makings in view of the current political climate. The primary topic of the draft amendment is the incorporation of sealed source requirements and adding tritium. The transportation amendment is separate, but General Council interpretation would be in effect until the amendment is final.

XVII. New Issues

NV asked about the process used for revising the RPPs to reflect new requirements. The Chair said the new requirements are in the review process. The Federal regulation process is taking 1 1/2 years. NV said the rule provides 180 days for an upgraded RPP, and NV asked if we are using new teams or old teams? The Chair did not want to speculate at this time, and emphasized that current efforts should be on getting RPPs completed.

The Chair discussed implications of Draft Order 470 and the incorporation of the RadCon Manual as a mandatory standard.

RFO requested an agenda two weeks in advance and also asked if there are issues from the RISG Report.

(ACTION: RFO will review RISG minutes for Committee.)

Another issue RFO raised was an update on Necessary and Sufficient Standards. The Chair charted the process of Necessary and Sufficient Standards presently being piloted. The SRIDS process is that if a requirement isn't used, the reasoning must be justified. The necessary and sufficient process involves agreeing on the sections of requirements that apply without justifying a requirement's not being selected.

EH-3 raised the topic of Radiological Engineering. The key is for radiological engineering to be performed "up front." RL is working on this issue. The information is not learned in a book, said EH. We don't want to be setting up for failure. No Radiological Engineering standards presently exist. EH stated this is a great opportunity to apply principles early in the design. DOE could find experienced people and develop a DOE Standard. The Chair thinks this issue could be discussed at the EFCOG Meeting.

(ACTION: Committee asked to propose concrete ideas regarding this issue at next meeting; HQ will work this for next meeting.)

EH-5.2 asked about supporting of ALARA Center. FoxPro based computer program is another source for Radiological Engineering projects.

A copy of the March 15, 1995, memo from LANL on Reporting Criteria for DOE 5000.3C was distributed to the Committee (**Attachment 20**). The comments included input from OR and other contractors.

NEXT MEETING: May 25-26, 1995, at the Sahara Hotel in Las Vegas, Nevada.

12 Attachments

Approved:

Gene E. Runkle
Chair
Radiological Control
Coordinating Committee

Date