

Radiological Control Coordinating Committee (RCCC)
Meeting Minutes
July 27-28, 1995
Boston, Massachusetts

I. Convene Meeting/Approval of Minutes

The RCCC meeting convened at 1:10 p.m. on Thursday, July 27, 1995. Proposals to modify the agenda and finish early Friday were approved. Attachment 1 is the attendee list. Attachment 2 is the Action Items.

The Chair discussed EM-25's "blank" segments on page 2 of the draft meeting minutes on May 25-26, 1995, at Las Vegas. YMSCO said June 16 was the date of rejection for the RPP of Yucca Mountain. They're pushing to get it completed next month. Because of the project management in Nevada, and interface with HQ management, there has been a time delay. Modifications to the May 25-26, 1995 draft meeting minutes were provided by EH-52, EH-3 and DP-311.

II. Discussion Of Budget Response To DFNSB

EM-25 prepared a response to the DFNSB request for the DOE Rad Budget. EM-25 asked that an additional column be added to the table saying if the budget figure was "total" or "core." "Core" would be the core radiation protection figure. Sometimes there is quite a difference between the core and total budget figures. The Chair asked who has responsibility for this response. NE-44 replied it is Murari Sharma, EH-52.

EM-25's management reviewed budget figures from EM's side, namely safety and health fields, radiation protection and the indirect cost reported in safety and health plans submitted to HQ in May. They determined the total planned cost of the radiation protection program for EM sites. They don't have ways to normalize cost per capita (or cost per site). Some sites cost \$2,000 per capita while others are much higher. The spread is "one order of magnitude." EM-25's management was immediately alerted. By mid-August EM will inform EM-1 about the budget figures. EM-25's recommendation is to form a team, including budget people and each operations office, to determine accuracy in the reported numbers. EM-25 said it is interesting to compare the small sites with the large sites. EH owes the budget response to the DNFSB. The other long-term cost determination project is something EM-25 will be doing for some EM sites.

III. Review Of Comments On Annual Report To Secretary

EM-25 distributed Attachment 3, "Radiological Control Manual Implementation Status, December 31, 1994." EM-25 identified the changes that came from comments provided by some RCCC Members. Most of the changes were because of budget revisions that were part of the response to the DNFSB request. The Committee reviewed the document and provided suggested changes.

The Chair said the RCCC was responsible for the annual report. The 1993 report went out in December 1994. There have been a lot of versions of the 1994 report which is being presently discussed. The RCCC has to move forward with this report to the Secretary.

IV. Discussion Of Where the RCCC Should Go From Here

The Chair provided a brief history of the RCCC. The RCCC has been in existence since 1992 with the functions that originated from the RadCon Manual and a charter to implement the manual in a consistent manner. A year ago the Committee began to implement the Rule 10 CFR 835. With the transition of the RadCon Manual from a requirement to a guidance document, and with the rework of the Committee's response to DNFSB Recommendation 91-6 (presently underway), the questions for discussion are, "What is the RCCC's function?" and "Where do we go from here.?"

At the last meeting the Committee discussed taking a position on the Order 470 section that downgrades the RadCon Manual to a guidance document. The Chair was adamant about not putting an RCCC position on the record for Order 470, particularly with the current RCCC charter that indicates the RCCC will ensure implementation of the RadCon Manual. Each Program Office and Field Office has had an opportunity to comment formally on Order 470. At the same time, the Committee indicated the RadCon Manual was a good document and had moved the department forward. (There were no objections from the Committee members.)

The question is, where does the RCCC go from here? DP-311 shared a memo from a staff person at DP which, paraphrasing, said the RCCC should be canceled or possibly reconfigured. There are a variety of opinions on the spectrum. The Chair has talked with Dr. Tara O'Toole, EH-1 and Dr. Don Knuth, DP-30. DP-30 thinks the Committee has done some very good things and has taken the radiation protection programs through some rocky times. DP-30 said the Committee has done a good job of getting the RPP process through the system and is supportive either way, for whatever the committee thinks should be done. EH-1's feedback included determining what needs to be done to empower the group, how are they effective, what do they want to accomplish, what kind of metrics should be kept to show improvement.

Another issue is the lack of an interface with the Under Secretary despite multiple attempts to get input on chair appointments and other items. EH-1 has been a mentor for the RCCC.

The Chair said where the Committee should report to is another issue. Is the Under Secretary too high a level to report to? Perhaps the Standards Committee would be more interested in having this report. There are lots of committees, but where do we find the right perspective? The Committee should brainstorm ideas and see what they think is possible. What can we accomplish? Also, what metrics do we use to get this accomplished? EH-1 and DP-30 are both interested in these questions.

V. Podonsky Oversight Report of RCCC

Overall feedback about the report is good, the Chair said, but there are some questions. Basically the report concluded the Committee is moving forward, but could do better with full-time support. The Chair asked how many RCCC members had seen the final signed report issued from Glen Podonsky? This is a good way to see how much communication we are getting in this system. The report was provided to all the CSO's and Field Offices. EM-25 said this occurred AFTER the report was provided to the Defense Board. The Chair said there were no "cc's" on the report. (Back in early July, Ollie Lynch's group sent out the report. Then a few days later the Chair got a copy of the report from the AL Manager's office.) The Chair said the report was not totally balanced, since a large cross-population of the RCCC was not interviewed.

SR received the same report with a stack of questions. The Chair has a copy which he'd be glad to share with any Committee members. The Chair was interested in how the report was filtered into the system. RFFO asked if the Committee should respond to the report.

(ACTION ITEM: The Chair will provide a copy of the Podonsky report with a copy of the cover memo to the RCCC members.)

The Chair read the following four recommendations from the report:

1. Revise the RCCC Charter. RadCon Manual should be revised to be specific with the RCCC Charter.
2. The Under Secretary should provide a budget for the RCCC.
3. RCCC Conduct of Operations should be improved.
4. RCCC Chair should be the overall Rad spokesman.

The Chair stated he is not sure what to do with this report. One strong program objection is to the RCCC Chair being the overall Rad spokesman. This strong objection was concurred in by all of the RCCC members and the Chair.

VI. Don Pearman's "Concept of Excellence"

Don Pearman recently visited AL and discussed the idea of "striving for excellence." The Chair asked the Committee how does this tie in with necessary and sufficient; the areas in the RadCon manual which refer to excellence; and the production of weapons components.

The floor was opened for discussion.

RFFO said one function the RCCC has done, which is modeled after Industrial Hygiene, is to be one pathway for the field's technical liaisons and programmatic people to have a forum. It is a valuable forum for technical issues to be discussed by technical experts. RFFO is not sure if there is another vehicle to do this. ID said the forum should continue. RFFO's point/issue is that from the field perspective the RCCC has not been a trivial process. It has been a sounding board for exemptions. As we get more of the integration

of managing type contracts, and as the Secretary wants to move toward privatization (ie; new way of doing business) the RCCC provides a vehicle.

SR said everyone has to prioritize resources. RFFO said that four years ago the RCCC just plowed ahead. This Committee has an opportunity to look at risk-based prioritizations. DP-311 said the Committee is generally better at advising and coordinating, rather than at producing outputs. DP-311 said the Committee can get consensus, but thinks it should move in the direction of providing advice (e.g., on exemptions). DP-311 conducted an informal survey of how the RCCC is doing. The respondents, DP Program Office (HQ) points of contact, said they would like to see requests for data go through HQ line. DP-311 would like to have data go through the line (normal flow of reporting).

The Chair said one of the recommendations out of the Podonsky report was to look at the membership of the RCCC and see if the right people are members. Everyone communicates well at the meetings, but when members return home other related items need to be worked, and some things get lost in the translation even though intentions are good.

RFFO said there is a difference between process knowledge and process-based information for example, the review process of what was necessary for each RPP and defining objective-based compliance. The RCCC developed an objective-based compliance. When 10 CFR 834 comes along or some other nuclear safety rule comes along, will we be able to use the same process? The Field and HQ need to develop a process to accomplish this. The RCCC developed a process to implement a nuclear safety rule which is very important. RFFO does not think another group at DOE sets both line and programmatic processes. RFFO said it is very clear whom to contact and what to do when a decision is needed on a clarification issue vs. interpretation issue.

DP-311/LLNL suggested the idea that each program office is a separate company. In private industry you have trade organizations. The purpose of those organizations is to take a position as a whole and try to influence. Maybe the Committee could develop a unified position.

RL said to support the RCCC, they have pulled a committee which includes the RCCC member (Dan Rice) and members of line management responsible for the program dollars. Through consensus they then develop site policy. The RCCC supports on a broader voice one opinion. RL has developed a book which has RL's position on issues.

DP-311 said the RCCC is perceived as extra workers for the Defense Board. RFFO asked who DP-311 actually polled and was told DP Program Office (HQ) points of contact.

OR stated there are several things we don't even realize. Four or five years ago, the people who are the most important people in rad protection -- the workers -- didn't think they had a vehicle to voice opinions. Now OR gets requests from the workers as to when

the next RCCC meetings are scheduled and has made the field people deal more directly with their people. The Committee has also helped to humanize the bureaucracy. EH-52's roadshow is a good example of that. Besides, OR said, a unified body is needed to temper some of these outliers we have in the Department. Without the RCCC there would seem to be no recourse for the field workers. OR thinks the Committee should ensure things meet the necessary and sufficient criteria. Without the Committee, Rule 835 would never have been developed, OR said, adding who is going to talk with the enforcement people?

YMSCO said they are expanding on the review of technical basis and asked why can't the Committee pick up some of those good practice documents and technical standards that need to be developed. YMSCO said the Committee should work on sound and practical tasks.

SR said there is a continuing need for our contractors, like EFCOG, to have someone for sharing ideas and lessons learned. Our contractors need somebody to interact with to provide some consistency of approach. SR said they conduct joint meetings to share lessons learned every six months and the RCCC would provide some consistency. DP-311 said the RCCC is valuable from a network standpoint.

EH-52 reiterated a lot of what's been said so far, stating a lot of individuals see the RCCC as the only communication system. EH-52 said there are numerous conflicting courses the Department is taking to provide health and safety guidance, but the RCCC provides a focus and point of reference. EH-52 does not see how necessary and sufficient should be splitting the department. The RCCC could certainly define some frame of reference and establish some level of consistency and allow for management of health and safety. EH-52 said there has been a lot of nice things said about producing technical documents, but the Committee has to be sure we can do what we set out to do. Other individuals have expectations of the RCCC that the RCCC can not meet. For example the DNFSB expected the RCCC to provide information it couldn't. EH-52 agrees with the idea of a technical forum, but the Committee needs to be realistic as to what is possible, not idealistic.

ER-8.2 said the RCCC should continue. SR said this Committee does need a sponsor/mentor who could provide support. The Chair said DP-30 thought EH-1 would be the right focal point for the RCCC. EH-1 chairs the Standards Committee. EH-52 said the only concern with that proposal is the appearance of the RCCC being an "EH" Committee. SR said the RCCC is still a committee that is in a technical discipline. That's the reason the Under Secretary level was originally chosen as the lead, focusing on the idea of perception. OR asked about FM. OR asked if there could be a hybrid. EH-1 suggested the Chair get ideas from the Committee and not worry about making something happen immediately but to be fundamental. OR said to include the idea of "EH/FM."

NE-44 said he has seen other committees that take an issue and go on and on with them. It would be good for transition issues to be resolved so everyone would know what line

office has responsibility for that item. For example, the issue with ETEC has never been resolved, but if this committee had representatives, they could recommend solutions and move items along in a more efficient manner (with CSO support).

EH-52 said that with the diminishing resources, the Committee could facilitate, identifying what issues need to be worked on first as far as safety and health is concerned.

The Chair said there is a perspective for competing safety concerns. For example, EM-25 provided data about one site spending \$6,000 and another spending \$600 and perhaps another not spending any money on the same issue. EM-25 said the RCCC integrates with the same magnifying glass each functional area.

The Chair said another area of concern is how does the Committee interact with budgets? ID and SR both said they are trying to get involved in the budget process, but it's difficult.

The Chair said AL goes out and looks to compliance and performance, but not at efficiency or the number of people tasked for a job (e.g., is it enough or too many people?). Some groups are starting to do these kinds of tasks. DP-311 said the Committee could advise that way. Are we getting the right bang for the buck? DP-311 said the key is the allocation of money.

SR said there is no consistent way of managing the money and allocating resources. RadCon inspectors are trying to get their arms around costs. The Chair said we are not doing a good job in that area, but we don't know how to get our hands around it. The Chair stated that as a complex we are not doing a good job. AL is good about looking at money needed to produce an item. In the ES&H area AL does not have accountability and the drive for efficiency. With budget reduction efforts going on, accountability for ES&H spending is going to be emphasized more. RL said Hanford began that process four months ago. RL asked internal and external dosimetry to come in with unit pricing and also asked both groups to look at necessary and efficient kinds of compliance. RL asked contractors to document compliance and put together a team to look at the DOELAP costs. RL said we need something we can put our hands on for costs, then the contractor can look at ways to reduce expenses. RL said their new contractor pushed them to do this because they do not have the same requirements as the previous contractor. The new contractor is looking at their own processes. RL said they would be happy to meet with anybody who is interested in the process.

The Chair said the Committee could come up with a "toolbox" to show how Hanford approached an issue and was successful in reducing budget costs.

DP-311 said we need to be careful not to usurp DP-1, EM-1 and so forth. EM-25 said you have various programs within each of the "-1's." The Committee should know to which parties their activities are responding to (i.e., Customer Focus).

EM-25 had the four following points:

- * Start with contractors. Lawrence Livermore made a presentation a year ago and the RCCC was not responsive to their requests and presentation. The Committee did not, in this case, provide a clear vision. So from the Contractor's point of view, the RCCC is not seen as a big help.

- * Reducing the cost of all S&H activities to such an extent that in the necessary and sufficient standards, I don't think the RCCC has any influence in these. I'm not sure if the representative of that particular office felt they had any tie-in. (Ex: Fermi and CH.)

- * I don't believe we came across as helpful to our line managers. As DP-311 said several times, in some instances perhaps due to the way in which we had to answer to some outside requests, we weren't integrated much with those. I'm concerned generally that we as a committee did not include line managers in our actions. I'm not sure if the RCCC delivers as much as we'd like to believe we deliver.

- * I'm also not sure if some of the deliverables would be more effective being "delivered" by program managers or office managers versus the RCCC. In some instances I believe we acted as a broker. For example, the Defense Board responses. In a way, we assumed a responsibility and we were not able to did not carry it very promptly or timely.

DP-311 said as an example, the program office was eager to give input, but we always have too short a time frame (This is a communication issue, keeping people out of the loop). There are a lot of Health Physicists at DOE, not just in this committee. LLNL said the group should focus on what this Committee does well and get out of the things that are causing trouble or problems. RFFO has heard several definitions of "line managers" and is trying to figure out who the line managers are. OR asked if the RCCC is named correctly. The Chair said that is a process issue.

OAK said there are several orders that need to be revamped. For example, what is a decontaminant? Another area is that Lawrence Livermore, Lawrence Berkeley and OAK are working a security issue regarding plutonium transportation. Another concern is the necessary and sufficient standard issue. The peer review team is becoming fragmented in some cases because of all the regulations. A fourth item would be that you have Industrial Hygiene and other disciplines, why not fold them into one overview or an advisory committee? With the way budget issues are going, it's important to see how things are integrated. The Chair said bringing together all the disciplines and all the various Operations Offices is a possibility. It was immediately objected to because you'd lose the interaction from the technical standpoint. SR said when you do that, you have to have committee members who are able to look at issues in a well-rounded way.

The Chair told the Committee there are a couple of common themes with the comments provided. Communication is one issue that seems to be common. The Chair proposed we decide what things we are doing well and what we aren't doing well.

Communication:

CH said focusing is a problem. The RCCC gets away from what the RadCon Manual dictates. Also, the RCCC sweats the small stuff too often.

OR said we need to divorce ourselves from the tie-in with RadCon. We need to make sure we are not the “RadCon Manual Committee.” In the last year, how much RadCon Manual work have we done? What is “radiological control?”

DP-311 does not think the RCCC tracks and trends well. People don’t seem to be getting items in a timely manner.

EH-3 said there is too much focus on paper and not what’s really going on in the world.

ID said the RCCC beats an issue to death.

FM-50 said there is a problem with external communication to stakeholders, contractors (ie: line management).

The Chair asked what do we do well.

DP-311 said they have good communication through horizontal lines.

RFFO said the Committee gets HQ people to talk to each other.

CH said they received some good clarification for 835 and that the EH pipeline is good.

SR said the Committee provided communication to get consistency for 835.

EM-25 said there is a huge diversity in RPPs. If you look at two RPPs, you’ll see a huge diversity.

EH-3 said the RCCC networks well.

The Chair asked how do we tie in excellence? In the system, excellence has suddenly become a bad word.

EH-3 gave the following real example: At a non-DOE site, decontaminating would take five days of critical path refuelling time with 12 rem total dose. With some simple changes, smart things, the time went down to 33 hours and the dose down to 4 rem.

RFFO asked to shed a little light on how “excellence” is defined. Our contractors came up with some performance standards/goals. For example, to reduce the turnaround time on anti-c’s to less than 30 days, the contractors defined several ways on how to measure the points and reduce the turnaround time. The problem was they forgot to ask the customer if the measure was important to them. The main problem was totally different from the reduction of turnaround time. My main point is that “excellence” is subjective to each individual. When you integrate excellence, you need to clearly understand or define what it means.

SR said the complex is struggling with this whole concept.

The Chair said the RadCon Manual has been thrown in as an “excellence document.”

RFFO said this Committee is inconsistent in defining what it hopes to attain. We don’t know if we’ve really got to the end of the journey yet. The RPP criteria was done well with a clearly defined goal, but with the RadCon Manual protection issue and implementing it, there wasn’t a clearly defined goal.

There are multiple places where we have the core training in place from the RadCon Manual. The Chair believes it is time to look at that training block perspective and from a rad perspective. Either we’re right on, right off, or need change. I don’t think anyone has looked at training from an implementation standpoint.

EH-52 said the Committee works well on well-defined topics such as exemption requests, but it seems that defining projects that the RCCC can handle is important. (Being realistic.) The technical issues are truly easier to define.

The Chair said a template of the Committee has been somewhat to protect the RadCon Manual. EH has been in this protective mode the last number of years. If we break that barrier down, there is probably some information in the Rad Con Manual that may be moved aside. We must use empirical data that supports going one way or another, but we shouldn't be emotional about it. There is no reason we can not use this cross-cutting Committee and get many people involved. The key is to have a process which looks at the requirements. It's a feedback loop that for many reasons we've tried to protect. Now we need to make sense of it.

The Chair asked whether the committee should be continued or abolished. DP-311 said we should revisit the charter to more clearly match reality with RadCon as it is now. Also revisit the situation in 1/1/96.

EH-3 said this Committee has a fantastic opportunity to do good things for the outside world. It certainly has been a benefit to me as long as I've been able to stay knowledgeable of what is going on with the complex. This provides an opportunity to tap into what's going on. The contractors don't have the time or budget to do this themselves. OR agrees 100% with what EH-3 just said. OR would ask FM-50 if the program offices and line people at HQ think we shouldn't exist. OR thinks the Committee should still find a way to get together to continue. EH-3 said defining "good" is a key.

RFFO asked isn't the purpose of the RCCC to provide a way to assist the workers. EH-3 said we need to improve the way DOE does work. Improving schedules, processes, radiological engineering, line management, and the overall workplace.

SR said there are compelling reasons to continue some exchange and sharing of information. If the Committee only exists, it will do that by the necessary exchange of information. It has provided consistency in the complex. If you stop that, the complex will diverge. We need the exchange of diverse ideas.

The Chair said this Committee was never envisioned to operate the way it presently is. When that chapter was written, the idea was to have a group of people to come together with one cause, one mission, one idea which is to implement the RadCon Manual consistently across the complex. The diversity that has evolved in the RCCC was never envisioned. RFFO said the privatization issue becomes more prominent, turning items over to private industries that are not under the Price-Anderson law is going to be an issue the RCCC would provide assistance with. This Committee needs to be able to provide to that. FM-50 said there is a private sector meeting in Santa Fe next week (First week of August). RFFO asked whether the people at that meeting understand the laws.

The Chair proposed the Committee try to capture all these ideas. We'll get these ideas out to the group. In summary, I wanted to find out if we believed there was a RCCC function. Please think about these ideas. Maybe three issues fit under one topic. We need everybody's feedback. FM-50 said focus has come up as an issue and yet there are many far-flung issues. We need to think about the issue of where we want to go. EH-52 said we are brainstorming right now. We need to lump together the ideas and continue on. This is an ongoing process but it will not be finished this afternoon.

SR said the Committee needs to decide what the RCCC can do best and where we can have the most impact on the DOE community.

The first step is to put like things together and proposed bringing these issues together in about one month. EH-1 would like to address the group in a month. The Chair proposed to have a meeting in Washington and give EH-1 these ideas, or else have a two-day meeting, with the first day to pull out the top ten items, then talk to EH-1 the following day. The primaries would also be invited to attend that meeting. Perhaps it could be held the second week of September. We could exchange ideas, even have a conference call. The approach may be to work one day and identify the 35-40 items, the top ten issues, then move forward.

The Chair said he has not done a comprehensive review of everybody's perspectives. I know there are people in the complex that would say, "Let's just forget this and I don't care either way." EH-52 asked, "Are we going to give EH-1 a pitch to continue the RCCC, or are we giving a pitch on the direction the RCCC is proceeding?" The Chair said we need to find what is value-added. DP-311 said we need to come to consensus when we see EH-1. I certainly intend to have meetings. I know ER has bi-weekly meetings with their program offices. I don't know if EM-25 has formal meetings. NE-44 said they meet on issues. We're so few numbers that we don't have such organization.

EH-1 provided the Chair some ideas on where to go with this meeting. If we are looking at a path forward, she would like to meet with the Committee. SR said the process the Chair outlined is good. If we decide there is value added, then we go forward with our proposal. If it is to ourselves, the primaries or EH-1 we need to come to closure. NE-44 said the Committee should think about it overnight and come back tomorrow morning with ideas.

The Chair said this is a lot of work to go through if our end date is 5 months away. The Charter issue, and renaming, are logistics issues. Just like who do we report to? We first need to figure out what we want to do, then how we are going to be empowered to do that, and whoever is going to be our mentor. I think EH-1 is one of our keys to success in this area. The Committee needs to decide. The Chair asked everyone to think about where we are and where we want to go.

DAY TWO:

The Committee convened at 7:30 a.m. on Friday, July 28, 1995.

VII. Radon Subcommittee Recommendations

The Chair said that from a technical perspective ICRP 65 is the latest information on Radon. EH-52 said apparently it is not quite the foregone conclusion that the NCRP is committed in their draft report to endorse the ICRP recommendation. They are not as supportive as originally thought. The Chair said the subcommittee has met on this and agreed to go forward. The subcommittee has not come to closure on the one dose assessment process.

EH-52 said last week we were at Fernald and met with Doug Daniels, Jack Zimmerman and others involved in radon monitoring and dose. The group came up with the approach that for the purposes of radon to monitor 500 millirem, including background. That would be for monitoring individuals who were exposed to radon. There doesn't seem to be the controversy between ICRP 65 and ICRP 32. Our conclusion would be to include radon. The Chair said it is not a simple matter and we have much variability.

FN said when we go to the 10% monitoring level, the number of people we will be monitoring will drastically be reduced. At that point it is simpler to include all the exposure they get at work as occupational exposure. Our feeling is that our site would take the resulting dose and add that number in as a dose for simplicity to make it livable and to move forward. We have got several large source at that site. A lot of folks are going to be under that 500 mrem.

OR said like at RFFO, the background is high in some of the places. RFFO said the direction we have given the contractor so far is that we do not consider radon that is not technologically enhanced. DP-311 does not see how you could get a good background number to subtract out even if you tried. EH-52 proposed a standard approach to take action at a certain trigger level, irrespective of background. EH-52 asked, is somebody going to get to that trigger? RFFO said they are not constantly occupied spaces, but some of the items in the vault, the soils around the tunnels, do not allow for use of some monitoring equipment. The Chair said it might be useful to discuss the RFFO approach with Fernald and UMTRA for consistency.

RFFO said they are finding clothing and skin contaminations due to the radon because of an extremely wet winter at Rocky Flats. FN asked what kind of levels are you talking about? RFFO did not know off the top of his head, but they do track those levels and they do look at them. The Chair said RFFO has not asked for a radon exemption. AL also had similar situations at LANL and LANL has asked for an exemption. Update Note: This exemption has been withdrawn by LANL. RFFO said they may end up asking for an exemption also.

VIII. Report on EH-3's visit to TMI

EH-3 passed a photograph around from his recent visit to TMI where he spent two days and came back with a whole laundry list of issues discussed, including policy/procedure,

pitfalls, package preparation, improvements and innovations in radiological engineering, interfaces with other organizations, ALARA functions, training qualifications, radiological engineering standards, and other items. It was a very productive trip, EH-3 said. They discussed how TMI has been able to get rad engineering into the planning process up front in terms of conceptual phases of planning that job and other theories. What TMI has done in terms of their systems is to have a systems performance team made up of engineering, maintenance, and a radiation engineer who are responsible for maintenance, modifications and other things. EH-3 has information for the Committee if any members are interested.

TMI has 32 rad techs and 15 other employees. They use collective dose, number of skin contaminations and industrial safety (accidents per 200,000). Also, EH-3 picked up a copy of their corporate radiological protection plan which is nowhere near as large as we have. In addition they gave an analysis of their personal contaminations and lessons learned kinds of things that deal with scaffolding plans, coordination of system flushes, airborne iodine, radiological spills and some other nuclear science items. They do a major critique of each refueling outage. In addition they have gone to integrating their Radiation Work Permits (RWPs) into the work documents. When they close out the RWPs, they capture the dose and put in other comments as far as the work package is concerned. In the near future they'll be including results of the ALARA and include it into the records management system. A computer-based system will have all the information there with results.

EH-3 said the photograph being passed around is of a pressure-operated relief valve. It is a print out from their surrogate travel section they have on a 12-inch optical disk. TMI can pull up a "tour" based on where you click on the computer system. They use the system for maintenance planning. My experience is that with drawings you do not see the interfaces but with this system it is something they use for emergency response but also for maintenance planning and training. This helps people see the job and what they need to consider. ID asked EH-3 what software package TMI is using to do their RWPs. ID thought some are using an integrated software system. ID asked the Committee if RadControl Management Systems "rang a bell" with anybody. It is a first for Rocky Flats, to integrate all the information, but they are not doing the resource loading yet.

FN said their whole work package includes everybody's input. The whole thing is part of a workpacket. It has worked exceedingly well and helped make more rational decisions, but there is a lot of resistance from people. RFFO said a lot of people think the RWP has to be a separate document. EH-3 said at TMI they found a lot of maintenance going on under a general RWP. EH-3 said TMI has a "point of shielding" checklist for situations where people are working around hot spots. They have an opportunity to do some temporary shielding. Essentially they can do this at the workplace. If the worker and the rad tech decide they can shield the hot spot at the site, they can complete the form and it becomes a document in the work package. They are saving time and saving dose by not having to stop. The Chair asked if there is a trigger point where they start that work. In other words if it's greater than "X" millirem, do they consider this? EH-3 was not sure what the trigger level is. He thinks it is variable, based on the job. For example,

removing the reactor head is a 10-hour job. It does not make sense to have a temporary shield to get lower fields in that area. TMI has a manual about claims avoidance, how you generate confidence and trust in the workforce. It also discusses how you go about making people trust the system and make them aware there is a rad con program there to protect them. The User Manual for GMS-2, their job control system where they have integrated the manual into the system, was discussed. They are interested in offering their services to other people to the extent their people are not tied up supporting just TMI. EH-3 thought this was something the Committee should be aware of.

IX. Reorganization of EH-50

EH-3 distributed a summary sheet of assistance when EH-50 reorganized. (Attachment 4). (Radiological Assistance Activities Summary, dated July 7, 1995.) EH-52 said the NRC still funds TMI and one might look there for some of the concepts and approaches they use.

X. Performance Indicators

The Chair said DP and EH have been doing some performance indicator work that may be responsive to the DNFSB staff request in this topic area. We have a couple of people to discuss that -- Richard Day, EH-33, and Dave Abbott, DP-311/LLNL. (Attachment 5). DP-311/LLNL said they are working cooperatively with EH. Part of the reason for doing that is because the performance measures are negotiated by the field offices and the contractors, two-way communications. There is a mission statement and the drivers are the DNFSB request, Troan's letter to DOE asking to show examples. Also, there is the EFCOG working group on performance indicators. They are working to find a standardized set and trying to find out if there is a common denominator for all of them. At a two-day workshop recently they repeatedly made requests for technical input from the technical people. Some of the performance indicator groups are part of a larger piece which is performance-based management.

DP-311/LLNL said there are numerous projects going on. Some are listed in the handout, including the Strategic Realignment. (Dave reviewed Attachment 5.) There is a quote from Don Pearman about having to step back and rely on performance indicators in the contracts to satisfy your oversight responsibilities. By the end of 1996 all contracts will be performance based and performance objectives should flow from the Strategic Plan. The handout provides a definition of what performance measures are and a discussion of how the University of California laboratories radiation protection programs are evaluated.

The Chair indicated SNL/NM fire protection has looked at their program critically. They have quantitative values to know that their objectives are being met and are in place. It is a composite system and that is the kind of thing we need to start exchanging around the system because we are all struggling with Performance Measures. SR said we need to understand what success really is because when you get into the subjective arena the definition of terms is critical. This is whether you are exceeding or meeting expectations.

OR said that at ORNL we are doing a pilot program to develop performance indicators. We have to make sure the program is technically sound before we rely on performance measures only.

DP-311/LLNL said that for collective occupational personnel exposure, their (LLNL's) goal is to get to 85% of the running average. If they do that, it far exceeds expectations. EH-3 asked if that 85% running average is split up among laboratories. It is not. EH-3 then asked how there can be control of the exposure. SR said that's where the problem lies.

DP-311/LLNL said most radiation protection performance measures are "negative." The increasing numerical values generally reflect failure in this case. DP-311/LLNL indicated the performance measures can be susceptible to gamesmanship and that the process also could encourage "meaningless" measurements. If you consider all the badged people in the DOE complex, even those who receive dose, you could show that DOE is in wonderful shape compared to the industry. This is something that we are struggling with. RL said that when we have a goal for no skin contaminations, they don't get reported. They are still happening, but we just do not hear it. It is a real problem at Hanford and a real sensitive spot.

EH-3 asked if anybody here used exposure hours. EH-33 said the normalization process is an area of challenge. SR said if you are not careful, they will not report what is wrong so they will appear to be doing well.

DP-311/LLNL said the ultimate goal should be to measure success, rather than failure. That would make things less susceptible to gamesmanship. There's an R&D 100 Award and we need to find something like that for Rad Protection. We want objective, measurable and meaningful performance measures, but performance measures are difficult to characterize. We do not have a lot of lessons learned at this point. There are initiatives coming from the top and field office initiatives also. There is a gap between the two groups and the contractor people are being asked to fill the gap. Reminder that these results will vary with application. These measures ideally will be rolled up and may be the only oversight type of information HQ will be given. It will affect every line of business at DOE.

EH-33 distributed Attachment 6 and said he will send one to those who did not get a copy. EH-33 said we are very interested in getting expertise and input from the RCCC. The number one driver behind this is tied to the DOE and ES&H Strategic Plans. To some extent, these are focused on successes. These are trying to show progress and performance, focusing on metrics or Performance Indicators that are deemed to be of the highest priority. The indices on Page 3 (of Attachment 6) are currently being piloted by EM-23. We are looking at ES&H. A lagging indicator looks at what has occurred, while a leading indicator is a precursor of things to come. We need the correlation between the leading and lagging indicators. EM-23 is taking the lead right now.

EH-33 said that on Page 4, is discussion of the process used to select the indicators that will ultimately make it into this program. We're very interested in getting peer review into this process. We plotted severity vs. frequency of the Performance Indicators (PIs). Those of medium or high risk proceeded into the next tier. It's important to consider the significance of the PIs. We are looking for a simple, qualitative approach. The next tier on Page 6 of the handout considers other aspects/characteristics of PIs. Is the data accessible? The Chair indicated, for example, RWP work hours may not be readily available at most DOE sites.

EH-33 said one of the thrusts behind this program determines where the indicator needs differ from the collection of data. We're going to be pulling data from all possible existing data sources. Collective radiation dose and worker compensation payments are two pieces of information we'd like to have from a quarterly time frame. Pages 8-9 describe the indicators that are going to feed into the leading/lagging information. We are not subject matter experts and we are actively pursuing people to assist us with that. These are a preliminary set at this time. The Chair said that within the EM document, there are the weighting factors that are put out as preliminaries. The process is a decent approach, but it's in its infancy stages. EH-33 said this is a tool, rather than a final product. This is directed towards DOE Senior Level Management. Is there a common core set of PIs? Not yet, due to the vast number of facilities in the Department. The Chair said we are finding the major accident/injury data do not agree with the CAIRS and the performance indicators data (PIOs). Somewhere along the line we've got to come into one system. We can't continue to support three or four systems.

EH-33 said the program is only as good as the data provided. We're not going to be requesting CAIRS data. You can question how well that data are believable, but it is something that needs further evaluation. EH-52 asked how EH-33 is going to get the data. EH-33 said primarily from ORPS and CAIRS. The Chair said this began with the DNFSB request from Jim Troan. This is what was brought up at the EFCOG meeting. We want to look at where we are at the moment. At that meeting, the request was what are the performance indicators?, how are you using the data?, and what is management doing with the data? We received the request in May at the RCCC in Las Vegas. The RCCC indicated we would bring the request up with EFCOG to discuss and would get data by midsummer. This is where we are. This was our action as a Committee. We are still within that scope. We did discuss it at EFCOG. Several contractors volunteered they had data they were using: OR, OAK, NV, OH, SR and AL. SR said Westinghouse was not at the EFCOG Meeting. RL said there was a Westinghouse/SR representative in attendance. The Chair indicated that SR said they had the information at the EFCOG meeting.

EM-25 said RL has beautiful data. RL said they are done. SR said he is not sure if they are done or not. OAK said they think they have done it also. OR said they have got a lot of data, but was not sure what to send. There is no rep from Nevada. OR has the data with him at this meeting.

DP-311 said I guess we looked at this differently. We went back and found it was impossible to get the information. EH-33 asked the Chair what are you looking for? The Chair said the DNFSB wanted examples of data and how we are looking at the performance indicators. EM-25 said the data have been collected, but there are gaps with the collection. AL has the quarterly reports and will get some examples of them. SR said they have monthly and quarterly reports with performance indicators in them. The Chair said we are just trying to share with the DNFSB that information. EH puts out a quarterly report.

The Chair said he is trying to get the working examples of where we are right now. EH-33 said RFFO puts out a quarterly report. This is a formal request which the RCCC has been asked to provide the information to the defense board staff.
(ACTION ITEM: All the information goes to Murari Sharma, HQ, as soon as possible.)

OR said we have got two issues here. OH said that what he remembers from the May discussion was that how were we using the data. EH-33 said that is a much more difficult thing to provide. SR said the use has to be two ways. Do we know how the contractor uses the data? The Chair said it is a two-part prong: what information is available and how they are using the information. EH-33 said he may be able to answer a chunk of that mail. The Chair responded, great, please provide it to M. Sharma, EH-52. The EM information that is documented is a major piece of where we are going along with a copy of EH-33's handout.

Let's move ahead and meet the DNFSB staff request with what EH-33 has and the information from the contractor sites listed above. At least if we have the list we can put it in some composite manner.

XI. Transuranic Limits and EH Site Representative's Role in 835

OR asked the Committee where they stand with the site reps as far as how we are doing business. As background, OR got a call from somebody saying they were not going to do Rule 835. ID said if it is not something based in the regulatory product, we just tell them we are not going to do it. OR is saying that things like this happen. The Chair said AL had another example. A site rep looked at an implementation process and the RPP said one thing, while the site rep said it does not meet the requirements of the implementation guides. These guides were provided as guidance to be used "as appropriate." So this is an issue that needs to be touched upon with EH oversight.

OR agreed and said as a Committee we need to figure a better approach. The Chair said an approach will be that he will talk to Ollie Lynch and provide him with our concerns in this area. From there, I think it has been clear that once the RPP is in place and signed off by the CSOs that it is "gospel." Keith Christopher said at Albuquerque last Wednesday that we will assess only the RPP. OR said the site reps are going to get the enforcement people spun up and we are going to be left in the middle. SR said their site reps are looking at oversight.

(ACTION ITEM: The Chair will speak with Ollie Lynch about these concerns.)

The Chair thinks EH has lead site reps. If we can not meet with all of them, we could talk through the process with the lead site reps to express the RCCC concerns. Rule 835 is across the board. They are interpreting the process. SR said as long as everyone looks only at the RPP, that is fine. EM-25 said the Committee should look and compare the manuals for oversight to see if they are consistent. EH-31 said their position is that if they have a disagreement, they talk with DOE before they go to the contractor. (ACTION ITEM: EM-25 will look at the differences between the two manuals.)

OR distributed Attachment 7, "Transuranic Surface Radioactivity Levels. OR has a 35-page document telling what the doses are at these levels. What it boils down to is a range which is on the sheet. Why put something out there that we can not do? (dose conversion factors) Some of the Pu numbers were "pie in the sky," OR said. The Chair said that for scanning technology the numbers are probably difficult to attain, but with swipe testing you can get down to the 20 dpm. EH-52 said the purpose of this statement/document, from our perspective, is that we want to see how we can move for a change. Maybe the RCCC wants to set up a subcommittee to further evaluate this issue. OR said a lot of our areas are uranium areas, but they have a little TRU. What is your default value? The law says you've got to be able to do "this," but you can't.

The Chair indicated that it is attainable, but may not be practical or cheap. That's the difference. OR said if I am working in an area, how do I do it? OAK said this is not for release of equipment, that you have to do it by swipe. The Chair said this lends itself extremely well to the need of having a subcommittee, say entitled "Practical Applications of the Transuranic Limits." This would try to focus on the limits, how they are attainable, but in the practical sense it would say here are the pitfalls and the limitations. I would think we would want the contractors and people from the industry included.

OR said he wanted to throw the issue out there. The Chair indicated he thinks the Andy Wallo division of 10 CFR 834 also needs to know about this. There is work going on right now by Andy to try and get some definition. OH said the ERCCC is also looking at this issue and asked if OR wanted to look at how do we achieve the detection issues. The Chair said he thinks everyone is handling this in their own way. It is like free release of material. OR said if you are going to rely on smearing every piece of equipment, you can't operate that way. The Chair said those are the kind of ideas we need in there. Look at it from both Rule 834 and Rule 835. I would propose that OR put together a straw charter for the group and some ideas for the group members and go from there.

(ACTION: OR and RL will put together a charter and try to make the subcommittee happen.)

XII. Infrastructure Evaluation Team Report and Management Action Team

The Chair said the report is out there and has several RCCC actions. It is in the review process right now. The main thing is that everyone is aware of the current status.

XIII. Follow Up On Any Outstanding RPP Issues

The Chair thinks the Committee has been very successful in getting all the RPPs approved. They all have CSO approval. ITRI was one day late. Martha Krebs signed it one day after the 180 days expired. The Chair asked if everyone docketed their RPPs, meaning you have to officially send them to Keith Christopher's shop. SR was not sure if that is clear. EH-31 said to send the approved plans to Sue Peterson of Christopher's shop. The Chair indicated the approved RPP becomes the official document for any enforcement action for the contractor. Please be aware that the Field Office has the responsibility to provide the copies of the approved RPPs to Sue Peterson.

(ACTION: For the next meeting, we'll have an update to make sure that everyone has docketed their RPPs. It's the last piece of the process.)

The Chair said the whole package has to go through. In reviewing, here's the present status:

Complete: AL, ID, RFFO,
Incomplete: OH, SR, OR, NV, CH
Pending: YMSCO

CH said contractors are allowed to make changes to the RPP as long as it doesn't reduce the effectiveness of the program. When the contractor makes a change to the RPP, they need to docket it for the first change. The Chair indicated this real-time update appears to be unmanageable. The approved version has to be the one put in the docket. EH-31 said when the changes do not change the document and intent, sending it to Sue Peterson is not needed. The Chair said if you miss a date on the RPP, you need to send information to the Ops/Field Office. SR said anything that comes in for reapproval must be docketed. SR has told his contractor that he is not changing the action plan dates. If they miss them, they are in trouble. The Chair said however the January 1996 date is not flexible. SR concurred and said he told his contractor not to submit a request for a change of date due.

XIV. Status of Exemptions

Generally it takes two months for an exemption to get through General Counsel. EH-31 takes care of the rules implementation steering group and works issues of this type. However, the final processing rate seems incredible. The process involves exchange of information between the contractor, field office, program offices and EH-52. EH-52 does their thing and says here we are, this is the exemption. General Counsel is saying that once it's finalized it takes two months for them to complete.

EM-25 said EH-52 has all exemptions on the table right now. Then these drafts will be sent to General Counsel in packages. Give them some time, a week or so, to review the exemptions, then meet and see what their points of view are and then have a common view. Fortunately the proposal came from EH. The Westinghouse exemption had many interactions within GC; however, they pretty much work together. It is not a matter of them rewriting each other's decisions. They now have a better idea of how to provide

comments back that will meet the highest level of General Counsel management. Say an exemption goes up to GC-1, basically they rewrote the EH technical position in a legal sense, for whatever reason. I guess they felt that reduced some liability. It was a rewrite to suit their sensibilities and their legal perspective. It did not change the sense of the approach, but it came back as a rewrite.

EH-31 asked if EH-52 was asked for their approval or concurrence? EH-52 said concurrence. FM-50 said that is not unusual, it's a common thing for them to do. EH-52 said their perspective is we will get as many out as we can. The Chair asked for the present schedule. EH-52 said he could provide a tally.

(ACTION: EH-52 will provide RCCC members a tally of the present schedule of exemptions.)

EH-52 said we can only give you a schedule. Our goal is to be done by the end of August. We have effectively resolved most of the issues. Radon is the most difficult one in my mind. CH asked EH-52 what the process time is. EH-52 said it takes a few weeks. CH said, therefore we're looking at least a couple of months at the least. EH-52 said no, that all the radons get handled together. We worked out the prototype radon exemption. We have positions on virtually all of them. It depends, if it is an issue we have to beat around, it will take longer. It is hard to give an exact status of how long it takes. Once again, we have three staff people and the contractors to do all of this stuff. Our goal is to have them done by the end of August. EH-52 has 36 (exemptions) in the system and the goal is to have them out by August. EH-52 reiterated that he would send the latest status list.

EH-52 provided the Committee with a rough idea of exemption positions thus far. The Chair asked if Mound withdrew their exemptions. OH said presently Mound did not turn in any exemptions in their RPP. EM-25 said Mound identified four possible exemptions in the RPP. OH said it is an insignificant change. Mound does not anticipate submitting any exemptions. EH-52 said they have taken the approach that if the contractor has written an exemption to provide a clarification, we simply state that. Therefore we do not have to have the exemption signed out at the GC-1 level.

EM-25 asked if ETEC was mentioned. EH-52 said it was. In addition to the 36 exemptions EH-52 is working on, there are a potential six exemptions from Brookhaven (CH). CH said those are going through ER-8.2, but he has not received them at this time. ER-8.2 has the responsibility to formally get them over to EH. RFFO said the NCPP request for exemption has been formally withdrawn. The Chair asked the Committee if everyone was comfortable with where they are with their particular exemptions. All Committee members indicated they are comfortable.

XV. Lessons Learned From The RPP Process

We're trying to provide lessons learned from the RPP review process back to the system to improve future interactions. We want to improve the system and make it more effective. Likewise we'd like to look at things that went well. Then EH-31 can take this

information back to the steering group. EH-31 said she was extremely impressed that the Committee managed to push this process as far as it has. The Chair said that at the last steering group meeting. Howard Wilchins complimented this group that despite all the obstacles we made it through. It is a very positive piece of work.

ER-8.2 said the process went fairly well because it doesn't make any difference to get "-1" approval. Getting that signature was a waste of effort. ER-8.2 did not see the value added to the process if there aren't any funding issues. The Chair said it was basically a formality required by 10 CFR 835. ER-8.2 asked then why do it. It seems we're doing something that is unnecessary. If it has a funding impact, then it makes sense for a "-1" to sign it. I don't see the point of Martha Krebs signing. It was a lot of unnecessary work.

The Chair asked about the exemption process. Is there a purpose to have a CSO unless it's a funding process. It's appropriate to keep the program office informed. We did a couple of RPPs where RL sent something directly to EH, but that seems to be a much more expedient process than going through a CSO. EM-25 would second ER-8.2's statements. Similar to the current necessary and sufficient process, program people are involved and have a voice as stakeholders, but approval could be moved at much lower levels.

EH-31 said exemptions are different. There's a standard being issued this week where we're proposing approval can be delegated down in writing. The Chair said in the Rule 835, there was no delegation at all. EH-31 said Brendan Burns is working on a delegation process for 10 CFR 834. If ER-8.2 wants, they can provide feedback to Ray Schwartz. ER-8.2 said he has already done that. If there's a funding issue, by all means it requires top level signature. EH-31 said that when a person delegates, they are still responsible.

DP-311 said that major nuclear power plants never submit RPPs. They don't have to submit changes, but they are fined if they don't follow the rule. The Chair said they are under a different funding process. DOE is an entity controlled and funded by itself. In our case it's an entity that has to ask for the funding and follow the law. CH said the RPPs he received had no value added to the contractor at all. They don't tell me (CH) anything. I spent 6 years in the nuclear industry working under the NRC. The NRC came in, looked at plans and procedures and determined if we were in compliance. I think the detail required by the implementation plans is contrary to the Department's philosophy of pushing work down to the contractors. We could have gotten the contractor to do a single letter saying they comply with Rule 835. It would have been valuable to separate the enforcement. EH-31 said that EM-25 made a similar comment. Is this perhaps that 10 CFR 835 is so detailed?

CH said Rule 835 is right on the money as far as detail is concerned. All we got out of RPRIMS is a basic review of a rule requirement. I don't see how they're going to implement or enforce it. EH-31 said one of the missing sections is that enforcement will go down to the lower field documents. ER-8.2 said there are two big RPRIMS issues. It

was developed late, but you can either repeat the rule back, or put in as much detail as possible. If you don't put in the detail, what is the purpose. It's not guidance. In the RPRIMS area, the data base was not friendly, not easy to change or modify. It also used a lot of computer space and could not be used as the required documenting software copy. ER-8.2 said they have an easier version. Rule 834 is a separate task, and ER-8.2 has not been assigned that task.

RL said it was timeliness in getting the RPRIMS that was the problem. EH-52 said he would like to respond to one comment by ER-8.2. There was a technical basis document that clearly required having a legal written commitment to implement and also tying a bridge to the other documents. Now, once again, everybody has different expectations to the process and what's going on. I didn't know how it would turn out. I'm not sure if it's enforcement or oversight. The reasons are written down, but I don't know what that will mean ultimately. People have different views on what the document means. It wasn't arbitrary. DP-311 said that won't be a problem with Rule 834. The criteria for review of the RPP development was followed by very few people. The Chair said the Implementation Guides were provided later in the process, which had a little impact with the final product. There was incredible resistance to adhering to an implementation guide that was "draft." It was handled informally. Basically these guides ended up to be off to the side and not being used. The oversight people will be coming in and saying the RPP says one thing and what you've done isn't consistent with the RPP.

LESSON LEARNED: Implementation Guides have to come out at exactly the same time as final documents with the rule. Also, review criteria for the implementation plans must be timely. We were late in that process and DP did a very nice job in moving us ahead, but we shared the criteria as we were developing them. We got EFCOG input and revised it. But the formality and the final were lagging. EH-31 said the Committee and Quality Assurance were handicapped in that manner. SR said they were fortunate they didn't have to turn something around. There was no firm guidance. Here's the implementation guides, you can look at them if you'd like to. That's what we were giving the contractor for a long period of the development time.

EH-52 said the Rad Con Manual was out for two years, but nobody paid attention. The big issue with the RPP was that the contractors were afraid of committing to anything. They wanted to minimize compliance as much as possible. EH-31 asked what would you do differently if we had to do this process again? CH suggested that you don't do the review part. Put the rule out and the contractor is responsible to do it. While they're doing it, DOE is training their people on how they will enforce the rule. SR said that because we are both owner and funder, that makes it different. We own that implementation and we can't back away from having knowledge of what it's going to take to implement. From a field perspective you've got to have enough money in the pot. This is a unique situation. We're owners and regulators. OH said for that reason, we should form the teams as soon as the rule is issued. They make the contractors enforce them. DP-311 said she also comes from the reactor side. Given people didn't want to always follow the RadCon manual, people kept calling and asking what should be included and should be in the plan at the absolute minimum. In retrospect, I wish we had

the NRC's Reg Guide. EM-25 said that one plus, but at the same time difficulty of 10 CFR 835, was that before a rule is published, the working group should work hard to identify and express clear policy on how to solve the differences between the current (process) and where we're going. At the same time, if we are going to favor a process of this nature, we should define terms with legal connotations, like guidance, statutory requirements and so on. That should be established up front. The third thing I learned from mistakes is that you should establish a firm schedule in the review process and approval process. We ran into problems because we didn't reserve enough time.

EH-31 asked why. EM-25 said three weeks may not be enough time for final program review, if you have comments generated, the comments need to be negotiated. EH-31 said in only rare circumstances should changes be made to the report. EM-25 said she did not think signatures from "-1's" is a good thing to do. Basically it was like asking for another review and asking for additional input. EH-31 said in essence it ended up being an additional review. EM-25 said there was a lot of additional interaction to get to a final version. It wasn't scheduled in.

EH-31 said she was struggling with "Necessary and Sufficient." The Chair said there are two processes here. One, how should you develop the RPP. What OR is saying is do we need implementation guides? Do you really need a lot of detailed items like implementation guides? Basically, we had a process on the table. The RCCC put RPRIMS together and developed review criteria. If you're going to use all of this stuff, it should be finalized as soon as possible. The second separate issue is do you need all of this information we worked with?

EH-52 said that five years ago you had teams going to each site with absolutely no guidance. When we put out things we were told it's good to have guidance. Now we seem to have too much guidance. Maybe we don't want to understand what should be done anymore. EH-31 said one perspective on implementation guides: Are they requirements? No, not for contractors.

CH said EH-52 hit on a good point about guidance documents. The DOE can be writing the equivalent to the NRC Inspectors Manual. They all inspect the same way. They've got a reactors branch inspection program. Everyone is singing from the same page of music. I think we should have a guide.

EH-31 said contractors say they're better off when they put as little as possible in an implementation plan, but if there's a lot of information, it's everybody agreeing to a certain way of doing business. CH said he's got no guidance, but a lot of latitude to define what is an acceptable program.

EH-52 said the issue really is who manages the program and how it is managed. DOE can't manage if there is not an expectation to what the program should be. What is the level of management. Some uniformity and level of guidance is needed along with standardization for evaluating these programs. The issue then becomes how far do you go? Seems like we're going in a circle. Five years ago people wanted the guidance, now

it seems to be back the other way. The Chair said the EH technical positions were very critical to the process, but they weren't timely in some cases. Plutonium dosimetry is an example. PMI said you need early feedback of what's needed and what we need to get that information back, to provide technical assistance. The Chair said "technical clarifications" is what we ought to call them.

EH-31 said there are some issues coming forward here that the Quality Assurance Rule Process never heard about. The Chair asked if the EH road show, which was put on prior to the issuance of 10 CFR 835, was effective? CH said that from contractors, he heard they got conflicting guidance from the roadshows. The contractors were not satisfied. The Chair said the roadshows did little because the information was conflicting. During the process we talked about the TSD/Ross need for an RPP. It was clear we did not need that from all concerned. But right now we're in the exemption process both TSD and Ross Aviation. That type of conflict ends up being a problem. With more people in the equation, more problems arise. OR said the roadshows helped raise some issues. The roadshow was OK, but we're fairly easy to please.

The Chair said the Quality Assurance Rule Implementation Group and the RCCC ran across this key issue: Where will the resources come from? From a program perspective it's difficult to get the resources to do this, but it's important to get that interaction. EH-31 said, would it be fair to say it was extremely complex? EM-25 said it was complex because we needed a consistent, fast approach with intercalibrated comments.

EH-31 said if money is involved, then it would be valuable to get the program comments. But with no money involved, it made things tough. EM provided lists of comments and this was a good analytical approach, but it was different from the team concept. In contrast to the DP process, we had a different program person for each team. Those people were on site. EM was involved in almost every RPP and could not provide a person for every review team.

EH-31 asked, should we try to figure out what would have worked better for EM. EM-25 said shifting responsibility to the lower level may solve a lot of these problems. EH-31 said perhaps with the RSIG member from each office. The Chair said he attended a couple of the RSIG meetings and from their perspective it was tough. EM-25 said perhaps it would help to not involve so many people in the process, for example, Savannah River's RPP. So many people wanted to look at the plan and they're all customers. CH said EM-25's review process was completely transparent. The comments really didn't effect the overall process. When push came to shove, it was an internal issue.

EM-25 said she had real technical comments from people and you can't ignore those considerations. The Chair said another issue happened with transition of facilities from DP to EM. DP is not interested in it and EM said they couldn't accept it. There was no formality of transition. EM-25 said two RPPs were hostage to that process. That's a lesson learned I forgot to mention earlier. The transition issues have to be resolved before the RPP is approved. To have a formal arrangement made before we get into the

final review cycle it is critical. EM-25 said she did not know a transition agreement had been signed. When I found out, I questioned the program person for nonconcurrence. There has to be a paper signed by all parties. DP-311 said nobody was sure and did not want to sign anything. EH-31 said this is why I'm amazed we managed to get through the process. But in getting there we may be able to help in the future.

OH said he was not hired by DOE until the plans were submitted. OH had three huge stacks of paper and no idea of whether anybody had interacted in developing them. The Chair said Mound was a unique interaction. Also the site was transitioned in the middle of the process. We had two flips in the same cycle. EM-25 said we often like to say we have to attract line people in order to be knowledgeable of rad programs. My experience with program managers is that they were quite honestly interested in these plans. With a few exceptions, the program managers wanted to help.

The Chair said the timing of approving exemptions is real critical. We need to make sure they are approved before the end of the cycle. The General Counsel interactions are very important, but they must be timely. That process needs to be looked at from a RSIG perspective.

OR related a particular horror story. OR said he did a poor job during the meetings of the review things that came to OR, but we could have solved those problems. My problems were from the enforcement people who weren't involved or needed to be involved. They didn't understand the process, but they got the local lawyers involved who formed committees that I had to work with. I got calls from people I never knew of and they were telling me things I had never heard. I got calls saying we'll accept an RPP with a matrix, and I got calls telling me they'd accept an RPP without a matrix. And we weren't even asking for money from any of these people. On top of that, someone turned us in to the Defense Board.

EH-31 said the Defense Board will be involved in this process. The one nice thing is that they're very interested in DOE developing an exemption process that would work smoothly. I'll take all the issues back that have been discussed.

The Chair said that people are overworked in this process. Everyone has a common goal, but as people get in your way and time gets tense it's hard to remember. RL said they're writing a report at Hanford.

(ACTION ITEM: RL will send a copy of the Hanford report to EH-31 and EM-25.)

EH-31 thanked the Committee for sharing their pain.

Attachment 8 is a copy of the June status report required for the Radiological Control Manual (RCM) Implementation Project from RFFO.

XVI. New Items

(1) Annual occupational exposure report. Everyone has received a memo from Nimi. They're going to start moving out in the July/August timeframe.

(2) Potential risk to future generations. Rule 835 allows you to undeclare your pregnancy. Lawyers are concerned about future claims of people whose mothers "undeclared" pregnancy when these people were in utero. Jay Masler said the courts will end up deciding this issue. It isn't anything we could handle. Lockheed-Martin may say they're not going to allow undeclared pregnancies. It is the responsibility of the employer to provide a workplace free of hazard. OR might want to talk with General Counsel.

(3) NIM: What does this acronym stand for?

- Nuclear Incident Monitor
- Nuclear Instrument Module

Think it is the Nuclear Instrument Module.

(ACTION: The Chair will look up what NIM is in a glossary of terms and contact EH-31 with the answer. NOTE: Resolved by other technical input at meeting.)

(4) Battelle is involved with Russia on a dosimetry project. RL is concerned that when DOE personnel travel to a foreign country, regarding Rule 835, are those employees under those dosimetry limits? If they exceed the limit, are they in violation of Rule 835. (ACTION ITEM: Joel said the question has never been answered. He will pursue that issue and report back to the committee.)

(5) The Chair asked the Committee what will be done with the items brainstormed? EH-1 has indicated she'd like to address the group somewhere along the line. We're trying to look forward and see where the RCCC is going. One person has indicated there is no value added to having an RCCC. A list of the brainstorming information was distributed. (ACTION ITEM: August 10 is the deadline for RCCC members to go through the ideas and group them into information blocks.)

The Chair thinks the Committee has made some progress. What we put up on the board may be totally different from what we receive feedback from others for. The contractor's perspective of the RCCC may be entirely different. Should we meet with EH-1 in September?

The Committee agreed that it would be a good idea to meet.

FM-50 asked, "Are we expecting to go to O'Toole with a product? If so, can we be prepared to do that? Do you want Mr. Pearman to be aware of this process?"

The Chair said Pearman's input would be valuable. If we want to disband, that's OK. I think we need the input. In the interim, I'm going to try and find out the interest of the RCCC at the Under Secretary's level. FM-50 said with White gone now, it is going to be

very tough. The Chair asked what are you going to do with an Acting Under Secretary? The most we're going to do is go into an acting process. We'd be much better with somebody at a lower level.

The meeting adjourned at 11:45 a.m. on July 28, 1995. The next scheduled meeting is on November 13-14, 1995, in conjunction with the DOE ES&H Conference, unless an earlier time can be arranged with Dr. O'Toole's schedule.

Approved:

Gene E. Runkle, Chair