

**Radiological Control Coordinating Committee (RCCC)**  
**Meeting Minutes**  
**June 29, 1999**  
**Philadelphia, PA**

The meeting began at approximately 8 am in Marriott Room 404. Attending were:

Gene Runkle, Chair  
Edward Blackwood, EH-3  
Maria Gavrilas-Guinn, EM-4  
Michael Henderson, ORO  
Margaret Lachman, OH  
Doug Minnema, DP-311  
Edwin Njoku, OAK  
Brenda Pangborn, RL  
Barry Parks, SC-83  
Joel Rabovsky, EH-52  
Clyde Terrell, SR  
Ken Whitham, ID  
Liz Thompson  
David Steffes

Note: Paul Neeson will be added to the mailing list as the CH representative, in place of Chuck Mansfield.

**Appendix E and 10 CFR 31 requirements for GL devices (Edwin Njoku)**

Edwin Njoku spoke to the differences between Appendix E and 10 CFR 20.1905 (a) & (b) with respect to labeling requirements. Often appendix E values are much larger than the corresponding 10 CFR 20.1905 values. As examples, Appendix E says that don't have to label containers of Ni-63 and S-35 unless the activities are 320 mCi and 400 mCi respectively. It was indicated that LBNL is following 10 CFR 20.1905 a&b if the limiting values are more restrictive than Appendix E.

Following Appendix E values, Ni-63 sealed sources would not have to be leak tested or accounted for unless the source activity is 3.2 Ci or greater. As a consequence, the gas chromatographs containing Ni-63 sources and other generally licensed devices, including exit signs obtained under NRC's 10 CFR 31 provisions, may not come under accountability or leak testing where required by the NRC on the General License or required on the manufacturer's license (10 CFR 32). This situation occurs because these NRC licenses do not apply to the DOE.

Consensus was reached as follows:

10 CFR 835.606(a)(2) - Labeling Exceptions. EH is reviewing the current labeling values relative to the corresponding NRC values. Based on this review, EH will consider proposing an amendment to reflect more closely NRC requirements in 10 CFR 20.1905 (a) & (b). In the interim, EH will put out a Technical Position Paper addressing the labeling issue, and advising sites that the labeling requirements may be amended to be more in line with the NRC labeling requirements.

General License Devices obtained under 10 CFR 31 Provisions - EH will put out a Technical Position Paper on the handling GL devices irrespective of Appendix E limits on sealed source accountability and leak test requirements.

#### **835.401(a) vs 835.402(c) monitoring (Mike Henderson)**

Mike Henderson noted that the 1997 DOE dose reports show that all of DOE is actually doing bioassay based on 401a rather than 402c since very few people are exceeding 100 mrem (about a 100 in DOE and a handful in ORO).

So few workers get over 100 mrem/year that a 402c program could be gutted. A handout was distributed and comments are due back to Mike.

#### **DNFSB letter on special tritium compounds (Maria Gavrilas-Guinn/Joel Rabovsky)**

Maria Gavrilas-Guinn distributed a handout and noted that doses could range from 100 mrem to tens to rems for a few people, depending on the exposure scenario to tritides. There are controversial scientific and technical issues in calculating the dose. The Tritium Focus Group is involved with the issue.

#### **Future radiation protection issues in the Department of Energy (Joel Rabovsky)**

Joel Rabovsky led the discussion about future issues. Edwin Njoku submitted RCT training as an issue. There was discussion (no consensus) about what an RCT was, and what constituted proper training; the number of hours and whether an open book test was adequate.

#### **Future role of the Radiological Control Standard (Joel Rabovsky)**

Doug Minnema noted that tracking dose in foreign travel for DOE Headquarters staff is an issue; it's done for field personnel but there are issues for Headquarters. There may be a DOE enforcement position on the issue.

Brenda Pangborn noted that five CHPs were hired at RL, and said they recommended retaining the shalls in the RL RadCon Manual.

Edwin Njoku observed that SLAC uses the RadCon Manual.

### **Draft technical positions (Joel Rabovsky)**

Joel Rabovsky notified the RCCC that it was in the process of developing two Radiological Control Technical Positions (RCTP). One of the RCTPs will address the issue of providing acceptable approaches for developing derived air concentrations (DACs) for tritiated particulate aerosols and organically bound tritium. The other RCTP will provide guidance on meeting the 100 mrem yearly dose expectation for individuals who enter controlled areas but do not enter radiological areas. Because EH had not completed drafting these RCTPs they were not distributed at the meeting. EH plans to distribute these draft RCTPs to the RCCC members within the next month.

### **The RPP review: criteria, progress, exemptions, specific issues (around-the-table)**

Maria Gavrilas-Guinn distributed a handout on her observations of the ongoing RPP reviews, and there was discussion about what should be included, for example compliance status. Maria plans to get comments out by mid-July.

Edwin Njoku discussed his position that gutted training at LBNL caused a P-32 contamination incident.

Brenda Pangborn reported that there was one exemption request and distributed a handout on the issue.

Mike Henderson reported his management thinks the commitment portions of the RPPs are in "a way" irrelevant since post 1-1-96 the contractor has to comply anyway. He is not going to commit resources to review any of the original 835 requirements that have already been approved once. He will use the resources to review the amendment but not excessively.

Edwin Njoku wants his team recommendations by the end of July.

Barry Parks reported that SC does not support Brenda Pangborn's position that shall in the RL RadCon Manual be incorporated in the PNNL RPP. The SC position is that RPPs only include 'shall' statements required by 10 CFR 835, because the RadCon Manual is no longer a mandatory document and there is no reason to incorporate it into the RPP for PNNL.

Brenda Pangborn noted that her position on 'shall' statements in the RPP is to provide for consistency across the site for dosimetry and records, training and postings, and noted an issue with unionized labor, and summarized with the observation that there was a misunderstanding on the issue. There was no agreement between RL and SC on this issue.

The meeting adjourned at approximately 2 pm.