

Radiological Control Coordinating Committee (RCCC)
Meeting Minutes
November 1-2, 2000
Las Vegas, NV

The meeting was held in Room A-110 (the Sedan Room) of the Nevada Support Facility, 232 Energy Way, North Las Vegas, NV 89030. The conference call number was (702) 295-3689.

Attendees:

Theresa Aldridge
Charlotte Carter
Maria Gavrilas-Guinn (by phone)
Kathy Hall (by phone)
Mike Henderson
Larry Miller
Doug Minnema
Paul Neeson
Edwin Njoku
Barry Parks
Ed Parsons
Joel Rabovsky
Clyde Terrell
Bruce Wallin
David Wheeler
Ken Whitham

Internal DOELAP (Mike Henderson)

There has recently been a letter from Bob Loesch, which said that Bechtel Jacobs had 'not documented' an adequate basis in their proposal to use ORNL's Bioassay Program. There was discussion about why a program, which was adequate for one contractor, might not be adequate for another. David Wheeler said the issue was that EH needs to assess if ORNL can, in fact, correctly analyze the samples from Bechtel Jacobs. There was also an issue that DOELAP accreditation included the whole program, such as record keeping. Ed Parsons said that Richland insists that contractors use one centralized processor, in order to be cost-effective. Mike Henderson noted that Oak Ridge couldn't compel contractors to do so.

Maria Gavrilas-Guinn discussed the work towards an integrated single contract for bioassays, by the ICPT (Integrated Contract Purchasing Team). The motivation is cost efficiency. There are still outstanding issues of the scope of work, and DOE agreement on the type of requirements.

Bruce Wallin asked what would happen if one central lab doesn't meet DOELAP? There would be no back-up capability, and there would be liability. Also, sometimes contractors need to have immediate turnaround for emergency situations, such as inhalations and injections; these bioassays need to be done on-site and are inherently more expensive than routine bioassays. EM stated that backup/alternative suppliers are being considered as part of this contract.

Applicability of 10CFR835 to D&D Operations; Issues With Continuous Air Monitoring (Bruce Wallin)

The discussion focused on the dilemma of air monitoring when disassembling systems whose contents are unknown. If you choose to sample for everything, it is expensive and difficult. Larry Miller stated that characterization is required, and if it is expensive and hard, then so be it. And, when something unexpected comes up, work should stop and the situation should be reevaluated. Bruce added that there are also chemical safety issues as well as radiological issues at Rocky Flats, including pyrophoricity. Larry Miller also stated that DOE sites should share information on characterizing D&D activities.

HEPA Filter Testing (Barry Parks)

There is still no consensus at DOE HQ on what to recommend for testing HEPA filters at the Filter Test Facility at Oak Ridge; with positions ranging from 100 percent testing of every new filter, to letting sites determine their own testing regimen, to no testing at all. Clyde Terrell noted that HEPA filters lend themselves well to statistical sampling, since they are manufactured in batches. He also said that the key to preventing filter failures seems to be transporting them in exclusive use vehicles. Larry Miller said that in his opinion the DNFSB has expanded the concept of defense-in-depth to include HEPA filters. Doug Minnema said that DP is seeking a project manager for revising the DOE air-cleaning handbook. Doug questioned whether this issue was within the RCCC's scope of expertise.

Presentation on Type A Incident at Los Alamos (Doug Minnema)

Doug Minnema gave a presentation on the Pu-238 uptake in Los Alamos, which occurred on March 16, 2000. His message was that this could happen anywhere. There were 8 individuals exposed in the room in TA-55, and one worker got a dose of 100 Rem, CEDE. This incident was one of the ten most significant doses received by DOE/AEC workers since 1947.

He noted that an RCT during a follow-up re-entry after the incident noted that he detected the leak in a reduction fitting for an argon line, but this information was lost when his notes were transcribed. This information reemerged during the course of employee interviews. Doug participated in the four week long investigation, and said there were issues with configuration management, configuration control, as-builts, policy on valve operations, design basis and controls on whom could do maintenance. The hazard analysis process failed, because 'historical experience' said that the risks were acceptable

without consideration for 'potential' risks. There was no formal recognition in facility documentation or procedures of the difference in dose per unit mass of uptake between Pu-238 and Pu-239, and the facility was designed to Pu-239. Therefore operational and radiation protection practices applied to Pu-239 processes were apparently deemed equally effective for Pu-238 processes. Investigation revealed that there was no record of when the argon line was last maintained. Doug also noted that the people who owned the process were not the ones who owned the room. Doug emphasized that it is important to understand the assumptions upon which facility safety is based, and to recognize the implied limitations that they place on the ability to recognize and respond to hazards during operations.

MOU between NNSA and EH (Doug Minnema)

Under the current DOE organization, EH cannot task NNSA or its contractors, but the Secretary of Energy can. Two functions that could result in EH tasking NNSA contractors are PAAA Enforcement and Independent Oversight; the issue is how will NNSA handle these functions. A MOU with EH on PAAA Enforcement should be signed soon. Under this MOU, EH-10 will submit action concerning NNSA contractors to DP-1 for final disposition. NNSA will also appoint NNSA employees as PAA coordinators at NNSA sites. On Independent Assessment, the thinking is to have EH-2 continue, but to report the results to General Gordon, not Dr. Michaels (EH). Exemptions to 10CFR835 will still be done by EH. Oakland Ops is now DP, and Y-12 reports to NNSA-HQ.

NNSA/RCCC Issues (Doug Minnema)

There was consensus that the RCCC would not task NNSA, and that there was no need to set up a separate RCCC-equivalent committee for NNSA. Mike Henderson said that Y-12 does not officially work with ORO, so at this time they are not represented on the RCCC.

Revision to RCCC Charter

DNFSB Recommendation 91-6 drove the creation of the RCCC originally. The original process was for the RCCC to report to the Under Secretary through "Senior Nuclear Managers" (which no longer exist). There was lengthy discussion of sponsorship and a markup to the draft charter; Joel Rabovsky made notes on the revisions. Barry Parks will send the final mark-up to all RCCC members via e-mail.

November 2

The meeting re-convened at 8:00 am PST, and Joel Rabovsky reviewed the proposed changes in the draft charter with Maria Gavrilas-Guinn, who attended the meeting via telephone.

RCCC Sponsorship

One approach is to get approval from the four PSOs (DP, EM, NE, and SC) on the revised RCCC charter; to re-affirm their sponsorship. Alternatives for sponsorship include the Chief Operating Officers (COOs), the Field Management Council, and the Undersecretary (T.J. Glauthier). Larry Miller raised the question of what are the performance measures for the RCCC.

Barry Parks suggested that DOE is managed like a university, and that RCCC sponsorship should follow that model. A university typically has a radiation safety committee, with members from all departments that have radiological issues, and the committee reports to the vice president for administration. The department heads do not manage the radiation safety committee, which would argue against having the four PSOs approve our charter. He also opined that the DNFSB is interested in the RCCCs existence, and that it might work to approach the Department representative to the DNFSB regarding having the Undersecretary approve the RCCC charter as part of our ongoing radiation safety commitments.

Larry Miller asked if 91-6 required a long-term commitment to maintain the RCCC. Maria Gavrilas-Guinn discussed the RCCC role in implementing the rule on a safety basis.

Ed Parsons said that Barry's idea would raise the status of RCCC; the fundamental issue before us is whether we maintain the status quo or not. The group then went around the table and each member expressed their views in turn on the pros and cons of getting sponsorship from the Undersecretary. The general feeling was that the group would continue to exist, because it has been around so long with well established personal relationship, and continues to fill a useful role, and that perhaps we should pursue a higher level approval (as suggested by Barry) as a long term goal over the next 3-5 years, there is no compelling need to hurry. As an immediate way of enhancing communication between RCCC members, the committee will initiate monthly or bi-monthly calls, and will solicit more input from the field.

Reducing Heat Stress/Modifying PPE

Personal protective equipment (PPE) has an effect on heat stress issues; it affects the body's ability to cool itself. Mike Henderson noted that when the number of skin contamination incidents can affect the contractors award fee, there is a financial incentive to require PPE where it can lead to heat exhaustion, risking injury and death. There were anecdotal stories that HP techs have felt their jobs were in jeopardy if skin contaminations occurred. The issue of PPE will be placed on the next RCCC agenda.

Proposed Changes to DOE Order 5400.5

In response to the DOE proposal to develop a dedicated facility to recycle contaminated metals, Bruce Wallin reported that Rocky Flats had already tried to do DOE metal

smelting in the past, and that it was not a success. Ed Parsons spoke to the need for special rates from power companies, increased ventilation, and personnel protection for such facilities.

There has been confusion in recent drafts of DOE O5400.5 between revisions 4 and 5. There was consensus that there will be a major impact from this Order but the impact is not yet quantified.

A major issue is the financial and liability issues that are a disincentive to releasing materials. Paul Neeson asked, if a contractor surveys and releases an item, why should they have to generate an encyclopedia? Ed Parsons noted a conundrum, in that EPA and a court order compel Hanford to release a substantial quantity of lead bricks, as a result of a multi-media inspection, but the no-release Order contradicts that action. Other issues are what constitutes 'personal property' and what is the meaning of 'indistinguishable from background'. There followed a lot of discussion on whether the RCCC should submit comments on the proposed changes to O5400.5, with no clear consensus to submit comments as a group.

Update on Special Tritium Compounds Working Group (Joel Rabovsky)

There will soon be a DOE Handbook on radiological controls for tritides and an addendum to the Internal Dosimetry Technical Standard (DOE-STD 1121-98) on using air sampling data for assess internal dose. Based on a RESRAD calculation there appears to be very little dose consequence at levels of 10,000 dpm/100 square centimeters for tritides; about 10^{-3} mrem per year. LRRI and LANL are doing a study on the dosimetry for Hafnium tritides. Mound is funding work on the development of a continuous air monitor for tritides.

EH-52 Regulatory Planning (Joel Rabovsky)

An amendment to 10 CFR 835 is planned that will incorporate Derived Air Concentrations (DACs) for tritides as well as other changes that were specified at the Denver meeting of the RCCC. There was discussion of the compensation bill for former DOE workers exposed to either radiation or beryllium (HR-4205), and the possible need for historical doses as a result of the legislation.

The meeting ended at 3:00 pm, November 21. The next call will be November 21, 1:00 Eastern, and discussion topics will include PPE and the revised charter.