# Radiological Control Coordinating Committee (RCCC) Meeting Minutes June 18, 2002 Tampa, FL

#### Attendees

Homi Amirmokri, NE
Hattie Carwell, BSO
Pete Darnell, OH
Brad Eichorst, AL
Wayne Glines, RL
Mike Henderson, OR
Paul Neeson, CH
Edwin Njoku, OAK
Barry Parks, SC
Ed Parsons, RL
Joel Rabovsky, EH
Chuck Radford, SRS
Doug Waldraven, RF
Bruce Wallin, RF
Ken Whitham, ID

## NRC proposal to reduce use of Personal Protective Equipment (Michael Henderson)

There was a handout of the NRC proposal taken from the NRC web site (http://www.nrc.gov/reading-rm/doc-collections/news/archive/02-039.html). The issue is reducing physical stress. Occurrence reporting for skin contamination drives PPE use. Mike advocated development of an RCCC position paper on raising the threshold for reporting skin contaminations in the Occurrence Reporting Program System (ORPS). The argument for reporting skin contaminations is that they are a measure of how well programs are controlled. There is usually no significant dose from skin contamination. One member raised the issue that revision of the ORPS system is being discussed this week, but the programs and the RCCC were not invited. Pete Darnell volunteered to draft an RCCC position paper on the issue, to include the cost of reporting (approximately \$25,000 per occurrence), the inconsistencies with reporting doses per 10 CFR 835, heat stress (with examples) and actual injuries attributable to excess PPE. Changes to occurrence reporting will probably have to be worked through with the Defence Nuclear Facilities Safety Board (DNFSB).

# Radiological Protective Clothing vs. Heat Stress (Joel Rabovsky)

Maria Gavrilas-Guinn has drafted a document on this issue, which could be issued as a technical standard. The RCCC needs to ensure that this is consistent with the position for the earlier issue on reducing reporting for skin contaminations.

#### Proposed Revisions to 10 CFR 835 (Joel Rabovsky)

There was a four page handout with a table of the proposed revisions. The idea is to issue the revisions as one proposed rule. There was discussion on the move to adopt ICRP60 dose, which makes a big difference for transuranics but little difference for radionuclides like carbon-14. The intent is to put out the proposed rule in a few months, and to give several options for how to change the dose methodology.

Enhanced Air Monitoring in view of the Technology Shortfalls of in-vitro techniques (how to meet the 40 DAC hr tracking issue) (Bruce Wallin)

Bruce discussed how air monitoring and lapel samplers are used at Rocky Flats to account for doses missed by urine/fecal bioassay.

### **External Regulation (Barry Parks)**

There was discussion of issues from the upcoming drive to external regulation for the Labs. Barry related his experience with the OSHA evaluation of occupational dose from maintenance work at Thomas Jefferson National Accelerator Facility. There is also an issue with external regulation on personal liability for field managers.

Distribution of RCCC Minutes (Edwin Njoku): It was decided to continue to post meeting minutes and contact information for RCCC members on the RCCC web site.

# Implementation of DOE 420.2, Safety of Accelerator Facilities (Edwin Njoku)

There was discussion on when an "experimental accelerator" at LBNL could be classified as an accelerator for the purpose of initiating an accelerator readiness review.

### Radiological H&S Performance Metrics (Ed Parsons)

There was a handout of several performance metrics for radiological health and safety, and considerable discussion about the utility of each measure. There is no practicable way to tie a production index to doses or contaminations.

#### PNNL ALARA Website (Ed Parsons)

There was a handout and discussion of the new ALARA website for PNNL. There will be an ALARA conference in the third week of October, hosted by Fluor Hanford, Inc. The website for the workshop is http://www.hanford.gov/alara/workshop.cfm

# **Information requested by NIOSH under EEOICPA (Ed Parsons)**

There were handouts of letters from NIOSH requesting detailed supplemental information for EEOICPA. NIOSH requests are inconsistent and very detailed. This is a records management issue and could become the de facto standard for record keeping, at

an increased cost. The path forward is awareness. There are now thousands of claims each month under EEOICPA.

# Policy 441.1, DOE Radiological Health and Safety Policy (Ed Parsons)

There was a handout of the policy, which has been out since 1996 and may need to be updated. No action was taken.

### **ERCCC (Ed Parsons)**

There was a handout of the membership list of the ERCCC, and discussion of the possibility of a joint meeting with the ERCCC to discuss mutual interest items. Wayne Glines reported that there was no response from Andy Wallo, EH, on the status of 10 CFR 834. The ERCCC last met a year and a half ago. A follow-up item will be to investigate having a joint meeting between the RCCC and the ERCCC.

Adaptation of ANSI 13.12: "Surface and Volume Radioactivity Standards for Clearance." August 1999 (Ed Parsons)

Ed asked if the RCCC should endorse the use of ANSI 13.12. The 'easy-to-detect' nuclides are going away, and they are used as a surrogate for hard-to-detect nuclides in site releases.

# Presentation on the Hanford Radiological H&S Document (Ed Parsons)

There were three handouts on the document; the contractor asked that it be put into the contract. Establishes minimum expectations in 10 topical areas for site radiological consistency and an organizational mechanism for the site contractors to manage site-wide radiological issues. It keeps requirements consistent across the site, and contractors have reciprocity for training. The glossary/definitions section is very important.

### Homeland Security (All) - agenda item not discussed.

Three follow-up items:

- 1) RCCC position paper on occurrence reporting for skin contaminations (Pete Darnell)
- 2) Investigate a joint ERCCC/RCCC meeting (Barry Parks)
- 3) Exemption request for reporting skin contaminations (Bruce Wallin)