

## Department of Energy

Washington, DC 20585

March 7, 2000

Dr. Robert I. Van Hook  
President  
Lockheed Martin Energy Systems  
P.O. Box 2009  
Oak Ridge, Tennessee 37831-8001

Dear Dr. Van Hook:

On April 10, 1997, the Department of Energy (DOE) Assistant Secretary, Environment, Safety and Health issued an Exemption Decision that granted Lockheed Martin Energy Systems (LMES) an exemption, with specified conditions, from a provision in Title 10 Code of Federal Regulations, Part 835 (10CFR 835), "Occupational Radiation Protection," which required that personal nuclear accident dosimeters be worn by all personnel who enter locations in which installed criticality alarm systems are required (10 CFR 835.1304(b)(4)). The Exemption Decision was granted for several specific locations at the Y-12 Plant.

Title 10 CFR 835 was originally published as a final rule in the Federal Register on December 14, 1993. On November 4, 1998, an amendment to 10 CFR 835 was published in the Federal Register that revised several of the requirements in 10 CFR 835, including a requirement for which an exemption was granted. The Office of Worker Health and Safety reviewed the April 10, 1997, Exemption Decision and determined that based on changes made to the requirements in the November 4, 1998, amendment, the exemption from 10 CFR 835.1304(b)(4) that excused LMES from the requirement that personal nuclear accident dosimeters be worn by all personnel who enter locations in which installed criticality alarm systems are required is no longer needed.

Title 10 CFR 835, subpart B, specifies that DOE activities be conducted in accordance with a documented Radiation Protection Program (RPP) as approved by DOE. Accordingly, the above Exemption Decision will be considered to be terminated when LMES achieves compliance with their RPP, which has been updated as a result of the November 4, 1998, amendment to 10 CFR 835.

Sincerely,

A handwritten signature in black ink, appearing to read "David Michaels".

David Michaels, PhD, MPH  
Assistant Secretary  
Environment, Safety and Health



## Department of Energy

Washington, DC 20585

April 10, 1997

Mr. F.R. Mynatt  
Lockheed Martin Energy Systems  
P.O. Box 2009  
Oak Ridge, Tennessee 37831

Dear Mr. Mynatt:

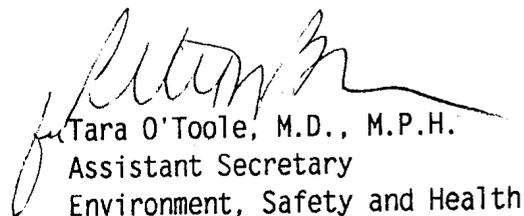
This letter responds to your November 22, 1996, request for exemption from a provision contained in Title 10, Code of Federal Regulations, Part 835 (10 CFR 835), "Occupational Radiation Protection." Specifically, this response concerns your request for exemption from a provision contained in section 1304(b)(4). The purpose of the exemption request was to obtain relief from requirements associated with providing personal nuclear accident dosimeters at eight locations at the Oak Ridge Y-12 facility.

The Office of Worker Health and Safety conducted a technical review of the exemption request (enclosed). Based on our review of the materials that were provided to us, a site visit performed on December 9, 1996, by Mr. Peter O'Connell of the Office of Worker Protection Programs and Hazards Management, and your staff's followup letter of January 3, 1997, providing additional information, the Department of Energy (DOE) is granting an exemption, with conditions, from the 10 CFR 835.1304(b)(4) requirement for the eight areas discussed in the exemption request and in the enclosed exemption decision.

The enclosed technical review provides additional information concerning the exemption decision.

The DOE Office of Defense Programs (DP) concurs with this response.

Sincerely,

  
Tara O'Toole, M.D., M.P.H.  
Assistant Secretary  
Environment, Safety and Health

2 Enclosures

cc w/enclosures:  
See attached list



## TECHNICAL REVIEW

### Lockheed Martin Energy Systems Y-12 Plant Exemption Request for Title 10, Code of Federal Regulations, Part 835 (10 CFR 835)

The Lockheed Martin Energy Systems (LMES) Y-12 Plant at Oak Ridge requests exemption from certain requirements of 10 CFR 835, "Occupational Radiation Protection," as they apply to the Y-12 Plant. LMES requests relief from certain requirements on providing personal nuclear accident dosimeters (PNADs) for all personnel entering eight specified locations at Y-12 where fixed criticality alarm systems are required. The Office of Worker Protection Programs and Hazards Management (EH-52) concurs with this request for exemption.

### Discussion

#### Request

LMES specifically requests relief from the requirement in 10 CFR 1304(b)(4), which requires providing PNADs for all personnel entering any of the following eight specified locations at Y-12 where installed criticality alarm systems are required:

1. Y-12 Plant outside of the Perimeter Intrusion Detection and Assessment System (PIDAS) fence north of Building 9212;
2. Y-12 Plant outside of the PIDAS fence east of Building 9206;
3. Y-12 Plant outside of the PIDAS fence northwest of Building 9215;
4. Y-12 Plant outside of the PIDAS fence southwest of Building 9720-5;
5. Y-12 Plant outside of Building 9720-9;
6. Y-12 Plant Containerized Waste Storage Area;
7. Y-12 Plant outside of the PIDAS fence west of the West End Scrap Yard and Building 9720-25; and
8. Y-12 Plant Above-Grade Storage Facility.

Generally, LMES is requesting the exemption to allow the establishment of PNAD zones based upon criteria other than that specified in 10 CFR 835.1304(b)(4) and to take advantage of existing physical boundaries and access points such as the PIDAS fence.

In the exemption request LMES provided a map detailing each specified location. In addition, during a December 9, 1996, site visit, Mr. Peter O'Connell, EH-52, discussed particulars of the exemption request and observed each of the eight areas. Based on discussions during this site visit, LMES provided the Department of Energy (DOE) with additional information concerning the exemption request on January 3, 1997.

On February 3, 1997, the Office of Defense Programs, the Y-12 program office, forwarded the exemption request to the Office of Environment, Safety and Health and recommended approval with specified conditions.

Requirement from which Exemption is Sought

10 CFR 836.1304(b): Nuclear accident dosimetry shall include the following:

- (4) Personal nuclear accident dosimeters worn by all personnel who enter locations in which installed criticality alarm systems are required.

Installed criticality alarms are contractually required by DOE at Y-12 in the Facility Safety Standards/Requirements Identification Document (S/RID) Sub-Element 18.06.01. The S/RID requires PNADs in occupied areas in which the expected dose exceeds 12 rads in free air, in facilities where the mass of fissionable material exceeds a threshold value listed in a specified standard (i.e., American National Standards Institute-American Nuclear Society N8.3), and the probability of a criticality accident is greater than  $10^{-6}$ .

Analysis

Each of the eight requested areas and recommendations are discussed below. The PIDAS fence discussed in several of the following areas consists of two fences--an inner and an outer fence. The following discussion is based on all individuals requiring access to the area inside the PIDAS fence and between the inner and outer PIDAS fence being issued PNADs.

1. Y-12 Plant outside of the PIDAS fence north of Building 9212.

The 12 rads isodose line from a postulated criticality accident in Building 9212 extends across a public access four-lane road. This road is located north of the PIDAS fence, which is located adjacent (north) to the building. The road is heavily traveled each work day and requiring issuance of PNADs to all individuals passing on this road would entail stopping all vehicles, issuing PNADs prior to driving in the vicinity of Building 9212, and then retrieving the PNAD. This endeavor would be costly and would probably create traffic problems and possibly increase traffic hazards.

LMES proposes establishing the PNAD required area to be consistent with the PIDAS fence north of the building. The resulting dose from a postulated criticality accident would result in approximately 20 rads at the outer boundary of the PIDAS fence and a lower dose at the public road. This dose is well below a dose where immediate medical care would be required.

Because of the difficulties associated with issuing PNADs to all individuals and because the magnitude of postulated dose in the area in question would not necessitate using PNAD results to assist in evaluating the need for prompt medical care, this exemption request should be granted subject to the following conditions:

LMES places fixed nuclear accident dosimeters (FNADs) along the perimeter of the PIDAS fence north of Building 9212. The proposed placement of the FNADs should be submitted to EH-52 for approval, including technical justification of the proposed dosimeter type and locations, through the Y-12 program office.

2. Y-12 Plant outside of the PIDAS fence east of Building 9206.

The 12 rads isodose line from a postulated criticality accident in Building 9206 extends across the PIDAS fence east of Building 9206 and includes the guard portal at Guard Post 8, which is one of the main entrances to the plant's protected area. Upward of 2400 individuals enter the protected area through this guard post, where they obtain and return PNADs, each work day. Using the 12 rads isodose line would require discontinuing use of Guard Post 8 for PNAD issuing and retrieval and establishing a separate PNAD issue and retrieval facility nearby. Logistically, there is no existing barrier or facility that offers similar capabilities as Guard Post 8.

LMES proposes establishing the PNAD required area to be consistent with the PIDAS fence and Guard Post 8. The dose from a postulated criticality accident would result in approximately 30 rads at Guard Post 8. This dose is well below a dose where immediate medical care would be required.

Given the difficulty in relocating the PNAD issue and retrieval facility, the negligible safety enhancement from using the 12 rads isodose line, and that the magnitude of potential dose in the area in question would not necessitate using PNAD results to assist in evaluating the need for prompt medical care, this exemption request should be granted subject to the condition that LMES places a FNAD at Guard Post 8.

3. Y-12 Plant outside of the PIDAS fence northwest of Building 9215.

The 12 rads isodose line from a postulated criticality accident in Building 9215 extends across the PIDAS fence northwest of Building 9215 and extends approximately 30 feet into the southeast corner of the west portal parking lot. Logistically, this corner of the parking lot could be cordoned off to limit access.

LMES proposes establishing the PNAD required area to be consistent with the PIDAS fence. The benefits would be that the PIDAS fence establishes an enforceable barrier for requiring use of PNADs, and consistent use of the PIDAS fence for requiring PNADs would result in workers better understanding the requirement. The resulting dose from a postulated criticality accident would result in approximately 18 rads at the outer boundary of the PIDAS fence in the southeast corner of the west portal parking lot. This dose is well below a dose where immediate medical care would be required and only slightly exceeds the value where a criticality alarm system is required.

Given the negligible safety enhancement, if any, from cordoning off the corner of the parking lot, the benefit of consistently using the PIDAS fence as a demarcation line where PNADs are required and that the magnitude of potential dose in the area in question would not necessitate using PNAD results to assist in evaluating the need for prompt medical care, this exemption request should be granted.

4. Y-12 Plant outside of the PIDAS fence southwest of Building 9720-5.

The 12 rads isodose line from a postulated criticality accident in Building 9720-5 extends across the PIDAS fence southwest of Building 9720-5 and includes Building 1501-2 and the outside area surrounding this building.

LMES proposes establishing the PNAD required area to be consistent with the PIDAS fence. LMES would also locate dosimeters in or around Building 1501-2. The resulting dose from a postulated criticality accident would be approximately 20-60 rads if building shielding is taken into consideration--up to approximately 250 rads, ignoring building shielding.

Building 9720-5 is a concrete structure that would provide shielding for most of the area in question. However, on the south side of the building that faces the area in question, there are two doorways that would provide minimal shielding. Because of the high potential doses (250 rads) in the areas opposite the two doorways, this exemption request should only be granted subject to the following conditions:

LMES installs shielding walls for the two doorways of Building 9720-5 facing south and the PIDAS fence. The shield walls should be designed to provide similar shielding of the building walls (i.e., reduce the potential dose at the PIDAS fence to 20-60 rads). In addition, LMES should place FNADs along the perimeter of the PIDAS fence southwest of Building 9720-5 and in or around Building 1501-2. The proposed placement of the FNADs should be submitted to EH-52 for approval, including technical justification of the proposed dosimeter type and locations, through the Y-12 program office.

5. Y-12 Plant outside of Building 9720-9.

Building 9720-9 is a sheet metal building located outside of the PIDAS. The building is used for storage purposes associated with waste management operations. The 12 rads isodose line from a postulated criticality accident inside Building 9720-9 would extend 160 feet from the exterior walls of the building and encompasses a plant road.

LMES does not want to close the plant road and establish PNAD issue and retrieval points along this road. LMES proposes establishing the PNAD required area to be approximately 25 feet from the exterior walls of the building. This area would not include the plant road. LMES would also locate FNADs around the 25 foot PNAD required area surrounding Building 9720-9.

Building 9720-9 is a sheet metal structure and minimal shielding is provided. The resultant dose from a postulated criticality accident at the proposed 25-foot demarcation point would be approximately 500 rads.

While the building has an installed criticality alarm system, there never was a Safety Analysis Report that requires the alarms. LMES is developing documentation to justify removal of the alarms from the building. The draft report, which appears to be based on reasonably conservative assumptions, indicates that the probability of a criticality in this building is not credible, i.e., less than  $10^{-6}$ . Once the report is finalized by LMES and approved by DOE, the installed criticality alarm system can be removed from the building and the 10 CFR 835 requirement for PNADS will no longer apply.

Although there is a high potential that the alarms will be removed and that the 10 CFR 835 requirement will not apply to this building once that occurs (because of the high potential doses (500 rads) around Building 9720-9), a temporary exemption not to exceed 1 year should only be granted subject to one of the following two sets of conditions:

1. LMES should place FNADs and appropriate postings to inform individuals of the need to obtain PNADs if they are entering the 120 rads isodose line around Building 9720-9 (the 120 rads value is consistent with the value used for the plutonium contaminated waste storage area discussed next). LMES should also ensure that individuals receive training on these postings. The proposed placement of the FNADs and postings should be submitted to EH-52 for approval, including technical justification of the proposed dosimeter type and locations, through the Y-12 program office. The temporary exemption should terminate after 1 year or once a final decision regarding

the need for an installed criticality alarm system is reached, whichever is sooner. If the alarm system is determined to be required or if the year expires without a final determination, then LMES should come into full compliance with 10 CFR 835.1304(b)(4).

2. LMES should restrict all work activities, with the exception of routine surveillances or inspections, inside Building 9720-9 and place FNADS and appropriate postings to inform individuals of the need to obtain PNADs if they are entering the 500 rads isodose line around Building 9720-9. LMES should also ensure that individuals receive training on these postings and the work activity restriction. The proposed placement of the FNADs and postings and schedule and description of the routine surveillances or inspections should be submitted to EH-52 for approval, including technical justification of the proposed dosimeter type and locations, through the Y-12 program office. The temporary exemption should terminate after 1 year or once a final decision regarding the need for an installed criticality alarm system is reached, whichever is sooner. If the alarm system is determined to be required or if the year expires without a final determination, then LMES should come into full compliance with 10 CFR 835.1304(b)(4).

6. Y-12 Plant Containerized Waste Storage Area.

The Y-12 Plant Containerized Waste Storage Area (CWSA) is an outdoor storage facility used for waste management operations. The facility consists of a concrete pad surrounded by a low concrete block wall and a fabric roof. The 12 rads isodose line from a postulated criticality accident in the CWSA extends 160 feet from the edge of the concrete pad and encompasses a plant road (South Patrol Road). The 12 rads isodose line also extends less than 100 feet beyond the site perimeter fence to an area that, while on site, is accessible (though infrequently occupied) to members of the public.

LMES does not want to establish PNAD issue and retrieval controls outside the site perimeter fence. LMES proposes establishing the PNAD required area to be on the South Patrol Road extending approximately 50 feet east and west of the CWSA concrete pad and placing FNADs in this area. Due to the low traffic volume, requiring drivers to stop to obtain and return PNADs would not pose any additional safety hazard. The resultant dose from a postulated criticality accident at the proposed 50 foot demarcation point on South Patrol Road is approximately 120 rads and would not exceed 120 rads at the site perimeter fence.

While the CWSA has an installed criticality alarm system, as was the case previously discussed for Building 9720-9, there never was a Safety Analysis Report that requires the alarms. LMES is developing documentation to justify

removal of the alarms from the building. The draft report, which appears to be based on reasonably conservative assumptions, indicates that the probability of a criticality in this building is not credible, i.e., less than  $10^{-6}$ . Once the report is finalized by LMES and approved by DOE, the installed criticality alarm system can be removed from the CWSA and the 10 CFR 835 requirement for PNADS will no longer apply.

Based on the high potential that the alarms will be removed and that the 10 CFR 835 requirement will not apply to the CWSA once that occurs, a temporary exemption not to exceed 1 year should be granted subject to the following conditions:

LMES should place FNADS and appropriate postings to inform individuals of the need to obtain PNADS if they are entering within a 50-foot perimeter around the CWSA. LMES should also ensure that individuals receive training on these postings. The proposed placement of the FNADS and postings should be submitted to EH-52 for approval through the Y-12 program office, and include technical justification of the proposed dosimeter type and locations. The temporary exemption will terminate after 1 year or once a final decision regarding the need for an installed criticality alarm system is reached, whichever is sooner. If the alarm system is determined to be required or if the year expires without a final determination, then LMES must come into full compliance with 10 CFR 835.1304(b)(4).

7. Y-12 Plant outside of the PIDAS fence west of the West End Scrap Yard and Building 9720-25.

The West End Scrap Yard is located approximately 85 feet from the northwest corner of the PIDAS fence. Building 9720-25 is adjacently located approximately 104 feet from the west corner of the PIDAS fence. The 12 rads isodose line from a postulated criticality accident in either the West End Scrap Yard or Building 9720-25 extends approximately 60-80 feet across the west and northwest sections of the PIDAS fence. This area includes various roads and portions of buildings. Logistically, this area would be very difficult to restrict access or otherwise ensure that PNADS are worn by all individuals.

LMES proposes establishing the PNAD required area to be consistent with the PIDAS fence. The benefit would be that the PIDAS fence establishes an enforceable barrier for requiring use of PNADS, and consistent use of the PIDAS fence for requiring PNADS would result in workers better understanding the requirement. The resulting dose from a postulated criticality accident would result in approximately 20 rads outside the western section of the PIDAS fence and approximately 45 rads along the northwestern section of the PIDAS fence. These doses are well below levels where immediate medical care would be required, and the doses in most of the areas only slightly exceed the value where a criticality alarm system is required.

Given the negligible safety enhancement, if any, from restricting access to the area in question, the benefit of consistently using the PIDAS fence as a demarcation line where PNADs are required, and that the magnitude of potential dose in the area in question would not necessitate using PNAD results to assist in evaluating the need for prompt medical care, this exemption request should be granted.

8. Y-12 Plant Above-Grade Storage Facility.

The Y-12 Plant Above-Grade Storage Facility (AGSF) is a waste management storage area. The facility is surrounded by a locked fence located approximately 35 feet from the edge of the AGSF. The 12 rads isodose line from a postulated criticality accident would extend 160 feet from the edge of the AGSF and extends a distance of approximately 125 feet beyond the AGSF fence to an area that is accessible, though infrequently occupied, to members of the public.

LMES wants to establish PNAD issue and retrieval controls at the AGSF fence and place FNADs along the perimeter of the AGSF fence. The resultant dose from a postulated criticality accident at the AGSF fence is approximately 250 rads.

The AGSF does not currently have an installed criticality alarm system. Previously, the AGSF was allowed to remove the installed criticality alarm system and replaced it with a series of compensatory measures for access. Similar to the other buildings previously discussed, there never was a Safety Analysis Report for the AGSF that initially required the alarms. LMES is developing documentation to justify removal of the alarms from the building. The draft report, which appears to be based on reasonably conservative assumptions, indicates that the probability of a criticality in this building is not credible, i.e., less than  $10^{-6}$ . Once the report is finalized by LMES and approved by DOE, the compensatory measures for access can be terminated and any 10 CFR 835 requirement for PNADS will no longer apply.

There is a high potential that the final report will indicate that the alarms and replacement compensatory measures for access were never, and are not now, needed and that the 10 CFR 835 requirement will not apply to the AGSF once that occurs. However, because of the high potential doses (250 rads) around the AGSF, a temporary exemption not to exceed 1 year should only be granted subject to the following conditions:

LMES should place FNADs and appropriate postings to inform individuals of the need to obtain PNADs if they are entering the 120 rads isodose line (the 120 rads value is consistent with the value previously used for the plant contaminated waste storage area) around the AGSF. LMES should also ensure that individuals receive training on these postings. The proposed placement of the FNADs and postings should be submitted to EH-52 for approval, through the Y-12 program office, and include technical justification of the proposed

dosimeter type and locations. The temporary exemption will terminate after 1 year or once a final decision regarding the need for an installed criticality alarm system or compensatory measures for access is reached, whichever is sooner. If the alarm system or compensatory measures are determined to be required or if the year expires without a final determination, then LMES must come into full compliance with 10 CFR 835.1304(b)(4).

### Conclusions

10 CFR 820.62 requires that exemption requests discuss the special circumstances that warrant the exemption. It is EH-52's position that LMES has successfully demonstrated that this exemption request meets the following special circumstances-- application of the requirements in the particular circumstances would not serve or is not necessary to achieve its underlying purpose or would result in resource impacts that are not justified by the safety improvements.

The exemption request should be granted with the specified conditions.

### Concurrence

Consistent with the technical position provided above, EH-52 fully concurs with the LMES exemption request.

### Duration of Exemption

Permanent exemption should be granted for areas 1, 2, 3, 4, and 7. A 1-year exemption (or until a final decision regarding the need for an installed criticality alarm system or compensatory measures for access is reached--whichever is sooner) should be granted for areas 5, 6, and 8.

## EXEMPTION DECISION

Pursuant to title 10, Code of Federal Regulations, part 820.61 (10 CFR 820.61), the Assistant Secretary for Environment, Safety and Health is authorized to exercise authority on behalf of the Department of Energy (DOE) with respect to requests for exemptions from nuclear safety rules relating to radiological protection of workers, the public, and the environment.

On November 27, 1996, the Lockheed Martin Energy Systems' Y-12 Plant (LMES) filed a request with the Department for permanent exemption from a certain requirement of Title 10, Code of Federal Regulations, Part 835 (10 CFR 835), "Occupational Radiation Protection." In particular, LMES requests relief from a certain requirement in 10 CFR 835.1304(b)(4).

The request states that the exemption is not prohibited by law; will not present an undue risk to the public health and safety, the environment, or facility workers; and is consistent with the safe operation of a DOE nuclear facility.

Under the terms set forth in 10 CFR 820.61, I am the Secretarial Officer granted review and approval authority for exemption requests made with respect to 10 CFR 835. Based on a review of the supporting documentation, I find that the request set forth above has been justified for relief from 10 CFR 835.1304(b)(4). Specifically, I find that the exemption criteria at 10 CFR 820.62 have been met. I have determined that the exemption is authorized by law; will not present an undue risk to the public health and safety, the environment, or facility workers; and is consistent with the safe operation of a DOE nuclear facility. I also find that the special circumstances, described in the technical position prepared by the Office of Worker Protection Programs and Hazards Management, constitute a sufficient basis upon which to grant this exemption.

On the basis of the foregoing, I hereby approve LMES's request for exemption from the stated section of 10 CFR 835 on a permanent basis for the following areas:

- Y-12 Plant outside of the Perimeter Intrusion Detection and Assessment System (PIDAS) fence north of Building 9212;
- Y-12 Plant outside of the PIDAS fence east of Building 9206;
- Y-12 Plant outside of the PIDAS fence northwest of Building 9215;
- Y-12 Plant outside of the PIDAS fence southwest of Building 9720-5; and
- Y-12 Plant outside of the PIDAS fence west of the West End Scrap Yard and Building 9720-25.

In addition, I hereby approve LMES's request for exemption from the stated section of 10 CFR 835 on a temporary, up to 1 year, basis for the following areas:

- Y-12 Plant outside of Building 9720-9;
- Y-12 Plant Containerized Waste Storage Area (CWSA); and
- Y-12 Plant Above-Grade Storage Facility (AGSF).

The 1 year temporary exemption commences on the date of the signature set forth below. The temporary exemption will terminate after 1 year or when a final decision is reached regarding the need for an installed criticality alarm system or when compensatory measures are determined for access for the above three areas-- whichever is sooner. If the alarm system or compensatory measures for access is determined to be required or if the year expires without a final determination, then LMES shall be in full compliance with 10 CFR 835.1304(b)(4).

The exemption is contingent on the following conditions:

LMES shall place fixed nuclear accident dosimeters (FNADs) as follows:

- o along the perimeter of the PIDAS fence north of Building 9212;
- o at Guard Post 8;
- o along the perimeter of the PIDAS fence southwest of Building 9720-5;
- o in or around Building 1501-2;
- o along a 50-foot perimeter around the CWSA;
- o along a 120 rads isodose line around the AGSF; and
- o either (1) along a 120 rads isodose line around Building 9720-9 or (2) along a 500 rads isodose line around Building 9720-9, and restrict all work activities with the exception of routine surveillance or inspections inside Building 9720-9.

LMES shall also place appropriate postings to inform individuals of the need to obtain personal nuclear accident dosimeters before entering the following areas and ensure that individuals receive training concerning these postings in the following areas: along either the 120 or 500 rads isodose line referenced above around Building 9720-9; along a 120 rad isodose line around the AGSF; and along a 50-foot perimeter around the CWSA.

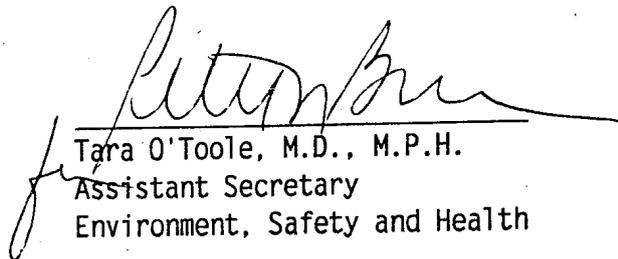
LMES shall install shielding walls by the two doorways of Building 9720-5 facing south. The shield walls shall be designed to provide shielding to reduce the potential dose at the PIDAS fence to 20-60 rads.

The proposed placement of the FNADs shall be submitted to EH-52, through the Y-12 program office, for approval, including technical justification of the proposed dosimeter type and locations. If LMES chooses the option of restricting work activities in Building 9720-9, the schedule and description of the routine surveillances or inspections in Building 9720-9 shall be submitted to EH-52, through the Y-12 program office, for approval.

All individuals requiring access to the area between the inner and outer PIDAS fence and within the inner PIDAS fence shall be issued PNADs.

Pursuant to 10 CFR 820.66, LMES has 15 days from the date of the filing of this decision to file a Request to Review with the Secretary. The Request to Review shall state specifically the respects in which the exemption determination is claimed to be erroneous, the grounds of the request, and the relief requested. If no Request to Review is submitted, the exemption decision becomes a final order 15 days after it is filed.

4/10/97  
Date

  
Tara O'Toole, M.D., M.P.H.  
Assistant Secretary  
Environment, Safety and Health