

Radiological Control Coordinating Committee Meeting
Teleconference
2:00 -300 pm 1/06/09

Attending:

| | | | |
|--------------------|------------|--------------|------------------------------------|
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| Enyeart, Tom | NSO | 702-295-4312 | enyeartt@nv.doe.gov |
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| Murphy, Robert | NNSA/LASO | 505-665-6437 | rmurphy@doeal.gov |
| Neeson, Paul | SC-ASO | 630-252-2258 | paul.neeson@ch.doe.gov |
| O'Connell, Peter | HS-11 | 301-903-5641 | o'connell.peter@hq.doe.gov |
| Pangborn, Brenda | RL | 509-372-3841 | brenda_m_pangborn@rl.gov |
| Parsons, Ed | RL | 509-376-2876 | joe_e_ed_parsons@rl.gov |
| Poppiti, Jim | EM-61 | 301-903-1733 | james.poppiti@em.doe.gov |
| Pugh, David | NNSA/NA-17 | 202-586-4079 | david.pugh@hq.doe.gov |
| Rabovsky, Joel | HS-11 | 301-903-2135 | joel.rabovsky@hq.doe.gov |
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The topics addressed at this meeting were (1) a new RCCC co-chair, (2) HS-11 activities in the area of radiation protection policy, (3) update on the revision of DOE O 5400.5 and (5) the use of SSN on reports required by 10 CFR 835.

New RCCC co-chair:

Barry Parks of the Office of Science and co-chair of the RCCC recently took a job in the Office of Enforcement HS-60 and resigned from the RCCC. The remaining co-chair, Joel Rabovsky, represents HSS which, except to a limited extent, does not represent line programs. Accordingly Joel asked the RCCC members for a volunteer representing a line program to serve as the co-chair. Paul Neeson representing the Argonne Site Office volunteered to serve as a co-chair of the RCCC.

HS-11 activities in the area of radiation protection policy:

Peter O'connell gave a review of current HS-11 activities in the area of radiation protection policy. Pete stated that since the amended version of 10 CFR 835 was issued in June 2007, over 90% of the associated guidance documents, both guides and technical standards, have been revised. Among the documents revised are the guides for implementation of 10 CFR 835 (441.1-1C), the Radiological Control Standard, the

Internal Dosimetry Technical Standard, the Plutonium Guide of Good Practices and Technical Standards addressing various aspects of radiation protection training. The Uranium Guide of Good Practices has been posted on RevCom. In addition the DOE handbook on Tritium Handling and Safe Storage has been revised to incorporate DOE handbooks and technical standards on radiological protection tritium and special tritium compounds and training at tritium facilities. This document has been through comment resolution and is awaiting final CTA concurrence prior to final publication.

In related areas, HS-1, based on the recommendation of HS-11, approved the 10 CFR 835 exemption request by Washington Closure Hanford to increase the surface contamination values in 10 CFR 835 Appendix D for certain hard to detect radionuclides. CH2HILL Plateau Remediation Company has recently submitted the same exemption request to DOE.

HS-11 staff has been participating with EFCOG in the development of (1) a template for requesting an exemption request to increase in the surface contamination values in 10 CFR 835 Appendix D for Pu-241 and (2) guidance for complying with the ICRP 60 dosimetry as it applies to neutrons.

Update on the revision of DOE O 5400.5

Joel Rabovsky and Wayne Glines have been participating in the revision of DOE Order 5400.5 *Radiation Protection of the Public and the Environment* Accordingly, Joel reported on the update of the revision to DOE O 5400.5. A draft of the 5400.5 directive has been developed and is ready for final HS-11 review. Submission to REVCOM is anticipated in March. Areas of interest relative to occupational radiation protection are (1) definitions are not incompatible with 10 CFR 835, (2) the new draft recognizes the availability of the authorized limit exclusion from 10 CFR 835, and (3) the impact of changes to the surface contamination guidelines. The surface contamination guidelines along with the Derived Concentration Guides are to be published in guidance documents.

Mike Henderson stated that ORNL had developed a procedure for the release of contaminated metals consistent with the draft revision of DOE O 5400.5.

Donald Brady stated that the removal of the table containing the surface radioactivity guidelines in the draft revision made the order more difficult to use. Wayne Glines stated that this table was removed from the draft revision and incorporated into guidance to make it easier to revise in the future.

Use of SSN on reports required by 10 CFR 835:

A concern was conveyed to HS-11 staff regarding a dose report resulting from a visit by a DOE HQ staff member to a DOE site. The dose report contained the individual's SSN. 10 CFR 835 requires (§835.801(a)) that the SSN or a unique identifier be included on reports of radiation exposure submitted to individuals. SSNs are considered to be OOU and may be covered by Privacy Act. This issue was conveyed to HS-11 staff several

years ago by ANL but a good alternative to the use of the SSN could not be determined at that time.

HS-11 staff is considering developing a technical position on this issue. Accordingly, they are interested in learning how DOE sites address this issue.

David Styers said the LANL does not use SSN as the unique identifier on exposure records. Instead LANL has developed a system of "Z numbers" so that a unique "Z number" can be assigned to any individual (including visitors) monitored for exposure to radiation. Several members suggested that the final four numbers of the SSN could be printed on exposure records in much the same way as the final four numbers of a credit card number are printed on the credit card receipts.

Brenda Pangborn stated that privacy considerations of the exposure data may be just as important as the SSN number. Joel Rabovsky stated that the current interest in the security of the SSN results from current concerns over identity theft. These concerns probably were not considered important when the Department's radiation protection requirements were developed in the late 1980's and early 1990's. However, proper control of an individual's exposure data needs to be evaluated.

Final topics:

Ed Parsons announced that the ALARA Workshop will be held at the Hanford Site on August 4 and 5, 2009.

The RCCC members agreed the next phone meeting should be held some time in March. Joel Rabovsky requested that the RCCC members submit topics to HS-11 for that meeting. Ed Parsons suggested possible revisions to 10 CFR 835 as a possible topic.