

Memorandum

December 19, 2007

To: Bruce Chrisman
From: William Griffing
Subject: Revised Fermilab Radiological Control Manual

The entire Fermilab Radiological Control Manual has been revised. The main reason for modifying the FRCM at this time is the need to incorporate revised requirements in occupational radiation protection announced in June 2007 by the U. S. Department of Energy. These changes were expressed as amendments to the regulation 10 CFR 835. Many of the changes can be implemented immediately without significant impact. However, some of the changes are more significant. In this revision of the FRCM, those provisions that will take longer to implement are specifically identified. DOE has allowed its facilities until July 8, 2010 to come into full compliance with these requirements. Editorial changes have been identified and made in this revision. This manual was out for labwide review and all comments were addressed.

After final approval, please return this approval page to Elizabeth Bancroft at MS119 for posting on the web.

Encl.

Recommended for Approval:



Bruce Chrisman

12/26/07

Date

Approved:



Piermaria Oddone

Date

4/10/08

CHAPTER 1 FERMILAB RADIOLOGICAL CONTROL PROGRAM

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PART 1 FERMILAB RADIOLOGICAL CONTROL MANUAL (SITE-SPECIFIC RADIOLOGICAL CONTROL MANUAL)

111 Radiological Control Policy

The Department of Energy (DOE) has given Fermilab senior management the responsibility of ensuring that DOE activities conducted on site comply with current regulations and standards. These include those activities that manage radiation and radioactive materials and that may potentially result in radiation exposure to workers, the public and the environment.

The Director of Fermilab continues to endorse the Laboratory's policies on the control of ionizing radiation as set forth in this Fermilab Radiological Control Manual (FRCM), a part of the Fermilab Environment, Safety, and Health Manual (FESHM):

An important objective at the Fermi National Accelerator Laboratory is to do our research in a manner such that the safety of personnel and the protection of the environment receives the highest consideration while at the same time we pursue excellence in the use of our Laboratory facilities. The procedures and restrictions in this Fermilab Radiological Control Manual have been carefully chosen to attain these goals in the context of the Laboratory's program of Integrated Safety Management.

All Laboratory employees, users, and subcontractor personnel are expected to adhere to our environment, safety and health policies. These general policies are stated in the Fermilab Environment, Safety and Health Manual of which the Fermilab Radiological Control Manual is an important part. Non-cooperation or flagrant disregard of environment, safety and health procedures will be cause for disciplinary action or for denial of the use of Fermilab facilities.

*Piermaria Oddone
December 2007*

Fermilab has, for many years, implemented the following radiological control policy developed to address the radiological control program pertinent to the operation and development of a high-energy research accelerator:

1. Particles shall be accelerated only when there are approved scientific, technological or medical uses for them.
2. No individual shall be exposed to radiation unnecessarily.
3. Radiation doses to individuals shall be limited to those maximum permissible doses set by the Federal Government through the Department of Energy.
4. The radiation levels at off site areas and on site areas open to the public, as well as in general offices, shall not be greater than the limits set by the Federal Government through the Department of Energy.
5. The beam absorbers, accelerator, and external beam enclosures shall be so designed that normal radioactivation of the soil, taking into account known hydrology of the site and foreseeable rainfall, will not contaminate water leaving the site above the permissible levels set by Federal, State and Local Governments.
6. Beam losses shall be limited so that the residual dose rate inside the accelerator and beamline enclosures, shall safely permit all necessary maintenance.
7. Radiation shielding of the accelerator complex and beamlines is to be stringently controlled.
8. Individuals in the Laboratory are responsible for environment, safety and health aspects of activities under their supervision.
9. It is the policy of Fermilab that exposures to unborn children as a result of occupational exposure to pregnant radiation workers shall be maintained as low as reasonably achievable (ALARA).
10. Fermilab activities conducted outside of the United States on territory under the jurisdiction of a foreign government are subject to the radiation protection requirements of the host government.

112 Radiation Protection Program

To ensure that Fermilab's Radiological Control Program is of the highest quality, the Department of Energy requires that DOE activities shall be conducted in compliance with an approved documented radiation protection program (RPP). The DOE reserves the right to direct or make modifications to the RPP in accordance with the provisions of the contract between DOE and Fermi Research Alliance (FRA).

1. The content of each RPP shall be commensurate with the nature of the activities performed and shall include formal plans and measures for applying the as low as reasonably achievable (ALARA) process to occupational exposures.
2. The RPP shall specify the existing and/or anticipated operational tasks that are intended to be within the scope of the RPP. Any task outside the scope of the RPP shall not be initiated until an update of the RPP is approved by DOE unless the changes to the RPP do not decrease its effectiveness or affect compliance with any regulation (see paragraph 5 of this Article).
3. The content of the RPP shall address, but not necessarily be limited to, each requirement in 10 CFR 835. The RPP shall include plans, schedules, and other measures for achieving and maintaining compliance with the regulations.
4. Updates of the RPP shall be submitted to DOE:
 - whenever a change or addition is made;
 - prior to initiation of a task not within the scope of the RPP; or
 - within 180 days of the effective date of any modifications to the regulations.
5. Changes, additions or other updates to the RPP may become effective without prior DOE approval only if:
 - the changes do not decrease the effectiveness of the RPP, as determined by the Senior Radiation Safety Officer;
 - the RPP, as changed, continues to meet the requirements as set forth in the regulations.

Proposed changes that decrease the effectiveness of the RPP shall not be implemented without submittal to, and approval by, DOE.
6. Updates to the RPP shall be considered approved 180 days after its submission unless rejected by DOE at an earlier date.
7. The modifications to the RPP required by the amendments to 10 CFR 835 published in the Federal Register on June 8, 2010 shall be implemented by July 8, 2010. The provisions that cannot be implemented by January 4, 2008 but will need to be implemented by July 8, 2010 are so indicated in **boldface** in this edition of the Fermilab Radiological Control Manual.

113 Manual Applicability and Control

This Fermilab Radiological Control Manual establishes practices for the conduct of radiological control activities at the Fermi National Accelerator Laboratory. It states

Fermilab's positions and views on the best courses of action currently available in the area of radiological controls.

1. This FRCM has been endorsed above by the Fermilab Director, the contractor senior site executive. It is considered to be part of the Fermilab Environment, Safety and Health Manual. This Manual is a living document. It will be revised as required to reflect regulatory requirements and "lessons learned" at Fermilab and other large particle accelerators worldwide.
2. This Manual shall be kept current and is a controlled document maintained by the ES&H Section in accordance with Chapter 1050 of the FESHM.

114 Compliance

1. It is intended that a graded approach be used in applying this Manual. Throughout this Manual, the words "shall" and "should" are used to clarify which actions need to be done to meet the requirements of this Manual. The word "shall" is used to denote mandatory actions that must be performed. The word "should" is used to indicate a recommendation or best management practice. In this context, "shall" statements are requirements, but "should" statements represent guidance as to the preferred practice.

The assumption underlying a graded approach to implementation is that it is not always feasible, economical, or indeed, in some cases, advisable to implement every recommendation of the Manual in all situations throughout Fermilab. A diversity of activities and experiments take place at Fermilab, and an action which makes sense in one situation is not necessarily a good idea in another. Many of Fermilab's activities are unique by their very nature and might call for special interpretations of the provisions of this Manual.

The graded approach is a process by which the level of analysis, documentation, and actions necessary to comply with the Manual are commensurate with the following:

- a. The relative importance to safety
- b. The magnitude of any hazard involved
- c. The life cycle of a facility
- d. The programmatic mission of a facility
- e. The particular characteristics of a facility
- f. Any other relevant factor.

Consideration of these factors will allow the implementing division/sections to focus resources on those activities most likely to reduce the associated risks and hazards.

2. It is important not to confuse the graded approach with exemptions from the requirements of 10 CFR 835 or other applicable requirements. Such exemptions are granted by the DOE to provide relief from requirements when sufficiently justified, in writing. "Shall" statements are requirements which must be implemented and many of these throughout this Manual are reflective of 10 CFR 835 requirements.
3. No individual shall willfully take or cause to be taken any action inconsistent with the requirements of this Manual.
4. Potential violations of the regulations or of the commitments made in the Radiation Protection Program shall be brought to the attention of the Senior Radiation Safety Officer in a timely manner. The SRSO shall coordinate the assessment of such potential violations through the designated Price Anderson Amendments Act (PAAA) Coordinator (see Articles 131.2e. and 135). All noncompliances will be reported in accordance with the requirements of 10 CFR 820 and applicable guidance.
5. In the ever-changing conditions of a research environment, circumstances may arise when the specific requirements of this Manual cannot be met. Such circumstances may involve departures from accepted Laboratory procedures. Procedures for addressing such circumstances are stated in Chapter 1010 of the FESHM and vary dependent upon the approval authority involved (e.g., Laboratory, DOE, or outside regulatory body).
6. Nothing in this Manual shall be construed as limiting actions that may be necessary to protect the health and safety of the individuals employed here, users of Fermilab facilities, or members of the public consistent with the FESHM or good practice.

PART 2 RADIOLOGICAL PERFORMANCE

121 Radiological Performance Measures

Performance measures shall be established as specified by current contract between DOE and the Fermi Research Alliance (FRA).

122 Assessments

Assessment, as used in this Manual, refers to the process of providing independent feedback to senior line managers to indicate the adequacy of the Radiological Control Program.

1. Inspections, audits, reviews, investigations and self-assessments are part of the numerous checks and balances needed in a good Radiological Control Program.

Internal audits of the Radiological Control Program shall be conducted such that over a 36 month period, all functional elements are assessed for program performance, applicability, content and implementation. A 30-day grace period may be allowed to accommodate the operation schedule.

2. The Fermilab ES&H Self-Assessment Program (FESHM Chapter 1040) describes criteria for the conduct of self-assessments in all areas of environment, safety and health including radiological control.

123 Workplace Awareness

The management of Fermilab encourages the individual employees, users, and subcontractors to communicate all problems of environment, safety and health to management. The individual employees, users, and subcontractors are encouraged to continuously evaluate conditions and make suggestions that might serve to improve performance in this important program of the Laboratory. Employees having concerns about radiological activities are encouraged to contact their supervisor. If not satisfied, they may follow procedures outlined in FESHM Chapters 1030 and 1060. Pertinent information on radiological control issues is provided to appropriate personnel through the Laboratory's Incident Investigation Program (FESHM Chapter 3020) and, when general distribution is appropriate, through articles in the employee electronic newsletter *Fermilab Today*.

PART 3 FERMILAB RADIOLOGICAL CONTROL ORGANIZATION

General radiological and conventional ES&H organization and responsibilities are described in FESHM Chapter 1030. Since management of radiological processes often requires specialized training and controls, responsibilities of the radiological control component of this organization are described here in more detail. Individuals responsible for developing and implementing measures necessary for ensuring compliance with the requirements of this Manual shall have the education, training, and skills appropriate to discharge these responsibilities.

The Director holds overall responsibility for radiation safety and compliance with all applicable laws and regulations, and has appointed the ES&H Director as Senior Radiation Safety Officer (SRSO) to represent him. The SRSO is the Radiological Control Manager for Fermilab. The SRSO counsels the Director in generating and promulgating radiation safety policy. The Director has assigned to each division/section head the responsibility of maintaining the Radiological Control Program in their areas. A division/section head may appoint, with approval of the SRSO, a Radiation Safety Officer (RSO) to represent him in technical radiation safety matters. These roles, responsibilities and authorities are described more fully below.

131 Responsibilities

General ES&H responsibilities of individuals and the tenant/landlord relationship are described in FESHM Chapter 1030. These concepts apply to the Radiological Control Program as well. This section describes responsibilities in addition to the general responsibilities.

1. The Director:
 - a. Is responsible for the Radiological Control Program.
 - b. Shall appoint a Senior Radiation Safety Officer (SRSO).
 - c. Shall assign responsibility for maintaining the Radiological Control Program to division/section heads.

2. The Senior Radiation Safety Officer (SRSO):
 - a. Under the direction of the SRSO, the ES&H Section:
 - (1) Shall perform frequent spot-checks and periodic reviews of the Radiological Control Program.
 - (2) May supply Radiological Control personnel upon request to conduct special surveys and measurements and assist division/section Radiological Control personnel in times of unusual need.
 - (3) Shall develop accelerator radiation standards in conjunction with appropriate division and section heads and the Director (see Chapters 2, 8 and 10).
 - (4) Shall acquire, distribute, maintain and calibrate radiation monitoring equipment (see Chapter 5).
 - (5) Shall assure proper maintenance of radiological protection records as specified elsewhere in this manual.
 - (6) Shall procure sealed radioactive sources and implement and maintain radioactive source and nuclear materials control and accountability programs (see Chapter 4 Part 3).
 - (7) Shall supervise shipments of radioactive materials entering or leaving the Fermilab site (see Chapter 4).
 - (8) Shall implement a performance measures program as specified in Article 121.

- (9) Shall lead the implementation of the Laboratory's program for maintaining radiation exposures as low as reasonably achievable (ALARA).
- b. Shall ensure adherence to this Fermilab Radiological Control Manual.
- c. Shall represent the Director in all matters of radiation safety.
- d. Shall inform the Director of any serious violations of the Fermilab Radiological Control Manual, the regulations or of the commitments made in the Fermilab Radiation Protection Program.
- e. Shall designate PAAA Coordinators as specified in FESHM Chapter 3030. The co-PAAA Coordinator for radiological matters is responsible for assessing reporting violations of the regulations or of the commitments made in the Fermilab Radiation Protection Program in accordance with the requirements of 10CFR820.
- f. May designate an Associate Head for Radiation Protection to serve as his chief technical advisor on radiation protection matters. This individual will serve as the ES&H Section RSO.
- g. Shall review the radiation protection aspects of new facilities or significant modifications to existing facilities. This shall include such issues as shielding, residual activation in beam enclosures, soil and groundwater activation, the production of airborne radioactivity, and operational controls, as applicable.
- h. Shall approve, in writing, of appointments of RSOs made by the divisions/section heads. RSO qualifications shall be documented on a case-by-case basis in detail and may include some or all of the following elements:
 - (1) Academic credentials in science or engineering appropriate to work in radiation protection.
 - (2) Certification in health physics by the American Board of Health Physics.
 - (3) Prior occupational experience in radiation protection.
 - (4) Successful completion of a training program established by the ES&H Section. The training program is to encompass the breadth of topics in radiation protection to be encountered at Fermilab as part of the assigned duties of the individual.

- i. Will foster an active program for the development and refinement of radiation detectors, dosimetry systems and measurement methods, and accelerator shielding methodology.
3. Division/Section Heads:
 - a. Shall be responsible for maintaining elements of the Radiological Control Program (which are not the responsibility of the SRSO) within the division/section.
 - b. Shall clearly establish the roles, responsibilities and authorities of division/section personnel within the framework of this Manual.
 - c. Shall ensure adherence to the Fermilab Radiological Control Manual.
 - d. Shall inform the Director and the SRSO of any serious violations of the Radiological Control Manual in a timely manner.
 - e. As applicable, shall ensure that beamline and experiment operating parameters are within the bounds specified by the appropriate Safety Assessment Document(s) (see Fermilab ES&H Manual Chapter 2010).
 - f. As applicable, shall maintain records of beamline intensity and radiation measurements as dictated by the SRSO. Record controls and retention shall meet the requirements in Chapters 5 and 7 of this Manual.
 - g. As applicable, shall implement a program for proper control and characterization of radioactive waste generated within their division/section. This program shall be consistent with Laboratory policy, and DOE and disposal site protocols.
 - h. With the written concurrence of the SRSO, may appoint one or more Radiation Safety Officers or designated points of contact for radiation safety matters within their organization. R.P. Form 14 should be used to document this concurrence.
 - i. Support, within financial, operational, and other management constraints, opportunities for continuing training of radiation protection staff within the division/section commensurate with their duties.
4. Division/Section Radiation Safety Officers (RSOs)
 - a. Shall represent the division/section head in all matters of radiological control assigned by the division/section head. Specific responsibilities

may be delegated to other radiation protection personnel in the division/section.

- b. Shall coordinate the division/section's radiation protection program in consultation with members of the ES&H Section staff as appropriate.
- c. May consult with the Director and/or the SRSO on any concerns regarding the division/section Radiological Control Program.
- d. Shall supervise the radiological control activities of the designated radiation protection professional staff and, where applicable, the radiological control activities of designated Radiological Control Technicians.

5. Division/Section Radiation Protection Staff

Shall carry out the radiation protection program of the division/section under the direction of the division/section RSO.

132 Fermilab Senior Radiation Safety Officer Qualifications

1. The Senior Radiation Safety Officer (SRSO) serves as Radiological Control Manager at Fermilab. This individual should be an experienced professional in environment, safety and health and be familiar with the general design features and operations of the facility that affect the potential for exposures of individuals to radiation.
2. The SRSO should have the technical competence and experience to establish radiological control programs and the supervisory capability to direct the implementation and maintenance of radiological control programs.
3. The SRSO should have a minimum of a bachelor's degree or the equivalent in science or engineering, including general familiarity with radiological control. Advanced academic degrees, experience, and formal training related to radiological control may be considered as part of these qualifications.
4. The SRSO is authorized to be supported by an Associate Head for Radiation Protection who has qualification equivalent to those described above with more specific background in radiation protection at an accelerator facility.

133 Radiological Control Organization Functions and Staffing

1. The staff of the Radiological Control Organization should include health physicists and other professionals with four-year degrees in science or engineering. Advanced degrees in physics or engineering are highly encouraged.

- A continuing training program should be established by supporting attendance at professional and DOE-sponsored meetings, academic qualification, continuing education courses, professional development courses, etc. Pursuit of certification by the American Board of Health Physics for professional staff members is encouraged.
2. Radiological support personnel provide health physics and radiological engineering, dosimetry, dose assessment, independent oversight, instrumentation and calibration functions. These personnel should have technical qualifications pertinent to their assigned duties.

134 Radiation Safety Subcommittee of the Laboratory Safety Committee

The Radiation Safety Subcommittee (RSSC), commissioned by the Laboratory Director, is responsible for coordinating the implementation and improvement of the FRCM. The RSSC reports to the Laboratory Director through the Chair of the Laboratory Safety Committee. The RSSC meets to discuss both occupational and environmental radiation protection issues and develop solutions that will promote compliance and uniform implementation lab wide. The RSSC serves as Fermilab's ALARA Committee. RSSC meetings are documented through meeting minutes.

The official charter is contained in Fermilab ES&H Manual Chapter 1030TA. The current list of members is maintained on the Laboratory Safety Committee website.

Fermilab's ALARA program is described in detail in Chapter 3, Part 5.

135 Price Anderson Amendments Act (PAAA) Program Implementation

The purpose of this article is to describe the Price Anderson Amendments Act (PAAA) Noncompliance Reporting program (see Article 114.4). Radiological issues and potential noncompliances with the Radiation Protection Program (see Article 112) are identified and evaluated through an interdisciplinary approach in accordance with principles of the Fermilab Integrated Safety Management Plan as implemented in the Fermilab ES&H Manual, including the FRCM. Overall responsibilities for PAAA program implementation are set forth in FESHM Chapter 3030.

1. The co-PAAA Coordinator for radiological matters employs a number of venues and methods to identify problems in the Radiation Protection Program and evaluate them for possible compliance issues. Prominent among these are the following:
 - a) Discussions at regular meetings of Laboratory Management, ES&H professionals, the Laboratory Safety Committee and its subcommittees

- including the Radiation Safety Subcommittee, and the Associate Heads of the ES&H Section.
- b) Notifications of events and issues as they arise by laboratory management, professional ES&H staff lab-wide, and other concerned individuals, including reports received through the Laboratory's Employee Concerns Program
 - c) Observations made by members of the DOE-Fermi Site Office (DOE-FSO) and other DOE officials and related follow-up activities of Radiological Control Organization staff,
 - d) Reviews of occurrences and programmatic issues identified at other facilities,
 - e) Results of formal assessments and reviews of ESHTRK entries.
2. The DOE Office of Enforcement and Investigation has established the Noncompliance Tracking System (NTS). This system is to be used by the PAAA Coordinators or alternate for the submission and tracking of potential regulatory noncompliances exceeding thresholds specified by DOE. Potential noncompliances beneath those thresholds may be tracked by an internal system designated by the contractor.
3. Potential radiological noncompliances exemplified by those that meet one or more of the following criteria should be entered into ESHTRK, with the relevant specific 10 CFR 835 citation to facilitate subsequent trending;
- a) Issues identified by means of formal audits that are not routine monitoring and inspection activities of the Radiological Control Organization,
 - b) Repetitive issues identified during formal or informal audits and reviews, even minor ones, that could possibly be indicative of systematic, rather than isolated failure to properly implement the Radiation Protection Program,
 - c) Minor issues other than those found and corrected during routine monitoring and inspections of potential noncompliance that cannot be resolved in a short period of time (a radiological posting having fallen off of a door is an example),
 - d) Issues that may plausibly lead to other, perhaps more significant, noncompliances (a missing sign needed to post the entrance to a high radiation area might be an example),
 - e) Noncompliances that potentially involve more than one division or section.
4. Potential noncompliances which, after screening, meet the criteria established by DOE for submission to its Noncompliance Tracking System (NTS) will be entered into the NTS system and tracked through resolution by a PAAA Coordinator or alternate after review by senior Laboratory management and consultation with the FERMI Site Office. A PAAA Coordinator will consult with the Senior Radiation Safety Officer and other ES&H Section staff to identify and

- implement additional reporting of radiological events under the DOE Occurrence Reporting System (see FESHM Chapter 3010) and to any external agencies under applicable requirements and regulations.
5. On an as-needed basis, a PAAA Coordinator will provide orientation on the PAAA reporting system and enforcement procedures to senior management staff and Radiological Control Organization personnel.

PART 4 DOE MANAGEMENT

141 DOE Employees on the Fermilab Site

DOE employees working at or visiting the Fermilab site are subject to and shall adhere to the provisions of this Manual.