

Department of Energy
Office of Worker Protection Programs and Hazards Management
Radiological Control Technical Position (RCTP 96-01)

Records of Release of Materials from Radiological Areas

Issue:

Some items released from radiological areas may not be uniquely identifiable and therefore, cannot be reliably associated with individual records after release from a radiological area. Questions have been raised over the type of records needed to meet the Department of Energy (DOE) requirements for records of release of material and equipment from radiological areas.

Introduction:

Title 10 Code of Federal regulations Part 835 (10 CFR 835) subpart L specifies the requirements for release of materials from radiological areas. 10 CFR 835.703 (c) and 1101(d) specify record keeping requirements for items released from radiological areas. 10 CFR 835.404 (b) requires that appropriate controls be maintained and verified that prevent inadvertent transfer of removable contamination to locations outside of radiological areas under normal working conditions.

Guidance on the release of materials from radiological areas to controlled areas is contained in Article 421 of the DOE Radiological Control (RadCon) Manual. Articles 342.5 and 442.5 of the RadCon Manual provide guidance on the use of tools in radiological areas. Chapter IV Section A.2.d of the "Occupational Radiation Protection Record-Keeping and Reporting Implementation Guide" (IG) G-10 CFR 835/H1 provides guidance on records for release of material and equipment from radiological areas to controlled areas.

Discussion:

10 CFR 835.1101(d) states "The records for release of material and equipment shall describe the property, date on which the release survey was performed, identity of the individual who performed the survey, type and identification number of the survey instrument used and the results of the survey." This provision does not specify that the description of the property include individual items. Therefore, maintaining logs which contain a general description of the property (e.g., box containing seven wrenches) released may be used as an acceptable approach to compliance with (1) the requirements for records of the release of materials and equipment and (2) the requirements to verify that there are appropriate controls which prevent the inadvertent transfer of removable contamination to locations outside radiological areas under normal

operating conditions.. Note that IG on occupational radiation protection record-keeping and reporting recommends inclusion of property and or serial numbers as part of the description. This recommendation would only apply when such information is available.

The DOE RadCon Manual contains the following guidance on the use of tools in radiological areas. Implementation of these measures should minimize the need for records of release of materials from radiological areas:

- Article 442.5: Reserve an assortment of tools primarily for use in Contamination, High Contamination or Airborne Radioactivity Areas. Tools should be maintained in a designated storage or distribution area or a contaminated tool crib. Controls should be established for tool issuance and use.
- Article 342.3: The use of radiologically clean tools or equipment in Contamination, High Contamination or Airborne Radioactivity Areas should be minimized by the implementation of a contaminated tool crib in accordance with Article 442.5 (see above). When such use is necessary, tools or equipment complex or inaccessible areas should be wrapped or sleeved to minimize contamination.

Technical Position:

An acceptable approach to compliance with the record keeping requirements for release of materials from radiological areas is to use a single record or entry that contains a general description of a group of non-traceable items released from radiological areas. In addition to the property description, such records must contain the information specified by 10 CFR 835.1101(d). Note that this technical position only applies to the transfer of materials from radiological to controlled areas.

References:

1. 10 CFR 835, "*Occupational Radiation Protection*," U.S. Department of Energy, December 14, 1993.
2. DOE/EH-0256T, "*DOE Radiological Control Manual*," Revision 1, U.S. Department of Energy, April 1994
3. G-10 CFR 835/H1, "*Occupational Radiation Protection Record-Keeping and Reporting Implementation Guide*," Revision 1, U.S. Department of Energy, November 1994