

SCWE NEWS

Volume 1

May 2005

Safety Conscious Work Environment (SCWE)

“An environment in which employees feel free to raise safety concerns without fear of retaliation.”

DOT&PF Policy statement Regarding SCWE

We are committed to provide an environment where employees are encouraged to raise concerns without fear of retaliation. It is appropriate for employees to spend work time in reporting concerns. Management at all levels invites safety concerns and are committed to the timely investigation and resolution of all safety related

issues. Retaliation for raising concerns will not be tolerated and when found appropriate discipline will be taken.

10 CFR 30.7

“Discrimination by a Commission licensee ...against an employee for engaging in certain protected activities is prohibited.”

Management from the Commissioner on down are committed to SCWE and have stated that they want concerns raised in order to keep both our employees and the traveling public safe.

We have received a number of concerns, including some that have been held back for years. We appreciate all those who have strengthened the program by bringing them forward. There have been several individuals who have had questions regarding the levels of radiation that they may be exposed to because of our use of Troxler gauges. These questions have allowed us to have frank and honest discussions with employees at several levels. The 2004 dosimetry results show that when gauges are used according to our procedures, very low doses of radiation are received.

In more than 85% of the dose records for individuals, the dose received by the gauge users was below the detection limits of the dosimeters. The detection limit is 10 mrem per quarter. Of those who received doses, the amounts were less than 3% of the dose allowed by regulation. This demonstration of care and attention to detail shows the level of effort being taken with the gauges and a good understanding of ALARA.

To address the issue of possible doses to the public, we have adopted the policy of posting the storage site survey with the other postings required by 10 CFR 19.11. As we all become better acquainted with the resources that we have, this question will be answered very quickly.

Of National Concern

After the SCWE training we received over the past two years, an observant individual raised a concern regarding language that is contained in most 40 hour RSO classes. The subject of the classes was NRC inspections. There is usually a bulleted list of what to do to prepare for and what to do during an NRC inspection.

One bulleted item read, "Never give unsolicited information." The question raised was, "How can we give this kind of advice and at the same time be telling folks they are always free to raise concerns directly to the NRC. Could this cause a chilling effect?" While we are not required to give unsolicited

information, everyone is always free to raise concerns directly to the NRC.

This is a good example of the need for the nuclear community, outside the power plants, to better understand SCWE. The individual who noticed this problem should be thanked for taking several of the SCWE lessons to heart. We talk in SCWE of having a questioning attitude, identifying and feeling free to raise issues. This is an example of applying those lessons. Our thanks to the one who raised this concern.

This issue will be passed on to the three training vendors that have been used by the state in the past three years. It will also be passed on to the NRC for comment and action.

Security Rule Change

Below is the actual content of the rule change regarding gauge security. I have read through the content of the Federal Register that was published January 12, 2005 including the comments and responses from the NRC. We are adopting this new requirement at the start of the construction season 2005. If you have any questions regarding the security of your gauge(s), please contact your Regional Radiation Safety Officer. The issues of note are these:

- The two independent controls means that two things must be defeated before the gauge and/or gauge and case can be removed.
- The intent of the rule change is to make the thief take more time thus increasing the likelihood of detection. Their response is, "by making it more difficult and more time-consuming to defeat the security measures."
- On the issue of visibility, the NRC rejected the request to

include the requirement of a cover or enclosure in the new rule. This means a box is not required to meet the new rule.

- It is possible that adding a second chain/cable and a second lock in such a manner that both would need to be cut before the gauge and/or case can be removed will meet the new regulatory requirement.

§ 30.34 Terms and conditions of licenses.

- (i) Security requirements for portable gauges:

Each portable gauge licensee shall use a minimum of two independent physical controls that form tangible barriers to secure portable gauges from unauthorized removal, whenever portable gauges are not under the control and constant surveillance of the licensee.

Regulatory Issues

In April 2005 the NRC issued a regulatory issue summary. This is a document that visits an issue of concern for the NRC. This issue deals with the reporting requirements of damaged gauges. The text of the summary states that **if a gauge is damaged such that the source cannot be shielded, the NRC must be notified.**

Please report any such damage to the Regional Radiation Safety Officer (RRSO) immediately. If the RRSO is not available, contact the Statewide Radiation Safety Officer. Contact numbers are included at the end of the newsletter. If you have any questions you can address them to the individuals listed above.

The reporting requirements state that if the source cannot be returned to a shielded position, the NRC must be notified within 24 hours. If the gauge is part of an event defined as such things as fires and explosions, the notification to the NRC must be done immediately or not to exceed 4 hours.

If a gauge is damaged such that the source cannot be shielded, care must be taken to keep the public and our authorized personnel safe. If the source rod cannot be returned to the shielding, secure an area 15 feet in all directions and restrict all access to the area until a lead pig or other shielding device can be placed over the source and the gauge secured.

For a complete copy of the text, please contact your Regional RSO.

A second issue that is of concern, especially with so many gauges traveling to the bush, is the receipt by DOT&PF personnel of a gauge in damaged packaging.

If a gauge is shipped and when we pick it up from the shipper the case is damaged, we must perform a survey on

the case and area within 3 hours of receiving the package at our facility. Because the time limit is so small it is imperative that we notify the Regional RSO immediately so that steps may be taken to verify there has been no leak of radioactive materials.

If a damaged case is found, secure the area until a survey has been completed and declared clean of contamination. If contamination is found, notify the carrier and the NRC Operations Center (301-816-5100) by telephone immediately.

Issue Summary

So that licensees are informed of the requirements for reporting damaged gauges, staff is republishing the specific conditions under which reporting is necessary. Therefore, in accordance with HPPOS-322, reporting the occurrence of damaged gauges is necessary when any one of the following conditions is met:

- The protective housing (i.e., shielding) is damaged such that the source is not fully shielded, or cannot be moved into the shielded position, in accordance with 10 CFR 30.50, "Reporting requirements";
- The source is left exposed in an unrestricted area such that the radiation levels exceed 10 times the limit of 2 mrem in any 1 hour (i.e., 20 mrem in any 1 hour) in accordance with 10 CFR 20.2203, "Reports of exposures, radiation levels, and concentrations of radioactive material exceeding the constraints or limits"; and 10 CFR 20.405, "Reports of over-exposures and excessive levels and concentrations" 1 .
- The incident results in doses in excess of limits in Part 20 or in the license, in accordance with 10 CFR 20.2203 and 10 CFR 20.405 [See Footnote 1.]

NRC 24 Hr. Emergency (301) 816-5100
NRC Safety Hotline (800) 695-7403
AKOSHA (800) 770-4940

Employee Safety Concerns Help Line—(888) 776-6540

Dan Monteleone—Statewide (907) 338-1482
Mike Oden—Northern Region (907) 451-2280
Larry White—Southeast Region (907) 465-1770
Unassigned—Central Region

Safety Officers

Greg Christensen—Statewide (907) 269-6248
Jeanne Dirks—Central Region (907) 269-0469
Diana Solie—Northern Region (907) 451-5087
Pat Harmon—Southeast Region (907) 465-1797

Radiation Safety Officers

Chain of Command—Contact Your supervisor or manager

Safety Concern Contact Information

STATE OF ALASKA 029
DEPARTMENT OF TRANSPORTATION & PUBLIC FACILITIES
STATEWIDE DESIGN & ENGINEERING SERVICES DIVISION
STATEWIDE MATERIALS
5800 E. TUDOR RD.
ANCHORAGE, AK 99507