NEVADA TEST SITE RADIATION PROTECTION PROGRAM

Revision 1

June 2008

**Prepared by:
Radiological Control Managers' Council
Nevada Test Site**

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**FOR THE USE OF NEVADA TEST SITE TENANT ORGANIZATIONS
AND THE U.S. DEPARTMENT OF ENERGY, NATIONAL NUCLEAR
SECURITY ADMINISTRATION NEVADA SITE OFFICE**

NEVADA TEST SITE RADIATION PROTECTION PROGRAM

Revision 1

June 2008

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REVISION LOG

<u>Document Number</u>	<u>Document Title</u>	<u>Revision Number</u>	<u>Date</u>
N/A	Nevada Test Site Radiation Protection Program	0	12/12/1994
Training Required: N/A Brief Description of Revision: Initial Issue			

<u>Document Number</u>	<u>Document Title</u>	<u>Revision Number</u>	<u>Date</u>
N/A	Nevada Test Site Radiation Protection Program	1	5/25/1995
This document supersedes Nevada Test Site Radiation Protection Program, dated December 12, 1994. Brief Description of Revision: A complete revision to reflect the recent changes in mission and organizational structure at the Nevada Test Site (NTS) and Yucca Mountain Project (YMP).			

<u>Document Number</u>	<u>Document Title</u>	<u>Revision Number</u>	<u>Date</u>
DOE/NV/11432-203	Nevada Test Site Radiation Protection Program	3	12/12/1995
This document supersedes Nevada Test Site Radiation Protection Program, Revision 1, dated May 25, 1995. Brief Description of Revision: A complete revision to reflect the recent changes in compliance requirements with Title 10 Code of Federal Regulations (CFR) 835, "Occupational Radiation Protection," and U.S. Department of Energy Notice DOE N 441.1, "Radiological Protection for DOE Activities."			

<u>Document Number</u>	<u>Document Title</u>	<u>Revision Number</u>	<u>Date</u>
DOE/NV/11432-203	Nevada Test Site Radiation Protection Program	4	5/20/1999
This document supersedes DOE/NV/11432-203, Nevada Test Site Radiation Protection Program, Revision 3, dated December 12, 1995. Brief Description of Revision: A complete revision to reflect the recent changes in compliance requirements with 10 CFR 835.			

<u>Document Number</u>	<u>Document Title</u>	<u>Revision Number</u>	<u>Date</u>
DOE/NV/11432-203	Nevada Test Site Radiation Protection Program	4-A	11/10/1999
This document supersedes DOE/NV/11432-203, Nevada Test Site Radiation Protection Program, Revision 4, dated May 20, 1999. Brief Description of Revision: A complete revision to reflect the recent changes in compliance requirements with 10 CFR 835.			

<u>Document Number</u>	<u>Document Title</u>	<u>Revision Number</u>	<u>Date</u>
DOE/NV/25946--144	Nevada Test Site Radiation Protection Program	0	08/09/2007
<p>This document supersedes DOE/NV/11432-203, Nevada Test Site Radiation Protection Program, Revision 4-A, dated November 10, 1999.</p> <p>Brief Description of Revision: A complete revision to reflect the recent changes in Tenant Organization contractors. Initial issue under National Security Technologies, LLC, contract.</p>			

<u>Document Number</u>	<u>Document Title</u>	<u>Revision Number</u>	<u>Date</u>
DOE/NV/25946--144	Nevada Test Site Radiation Protection Program	1	06/11/2008
<p>This document supersedes DOE/NV/25946--144, Nevada Test Site Radiation Protection Program, Revision 0, dated August 9, 2007.</p> <p>Brief Description of Revision: A complete revision to reflect the June 2007 updated 10 CFR 835 regulations and include an implementation plan and schedule.</p>			

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ACRONYMS

ALARA	as low as reasonably achievable
AMAD.....	Activity Median Aerodynamic Diameter
CBT	Computer-Based Training
CED.....	Committed Effective Dose
CEDE	Committed Effective Dose Equivalent
CFR.....	Code of Federal Regulations
CP	Control Point
CT-ESH.....	Central Training - Environment, Safety, and Health
DAC.....	Derived Air Concentration
DAF	Device Assembly Facility
DOE	U.S. Department of Energy
DOELAP.....	U.S. Department of Energy Laboratory Accreditation Program
DOT.....	U.S. Department of Transportation
DRI.....	Desert Research Institute
EH&S	Environmental, Health and Safety
ES&H	Environment, Safety, and Health
GERT	General Employee Radiological Training
HASP	Health and Safety Plan
ICRP.....	International Commission on Radiological Protection
JASPER	Joint Actinide Shock Physics Experimental Research
JNPO.....	Joint Nevada Program Office
LANL	Los Alamos National Laboratory
LANL/NTS.....	Los Alamos National Laboratory/Nevada Test Site
LINAC.....	Linear Accelerator
LLNL.....	Lawrence Livermore National Laboratory
LLNL-N.....	Lawrence Livermore National Laboratory-Nevada
M&O	Management and Operating
NAC.....	Nevada Administrative Code
NNSA	U.S. Department of Energy, National Nuclear Security Administration
NNSA/NSO.....	National Nuclear Security Administration Nevada Site Office
NRC	U.S. Nuclear Regulatory Commission

NEVADA TEST SITE RADIATION PROTECTION PROGRAM

NSO	Nevada Site Office
NSTec	National Security Technologies, LLC
NTS	Nevada Test Site
NV	Nevada
NV/ERP	Nevada Environmental Restoration Program
NV/YMP	NTS and Yucca Mountain Project
OCRWM.....	Office of Civilian Radioactive Waste Management
PC	Protective Clothing
RCO	Radiological Control Organization
RCT.....	Radiological Control Technician
RCM	Radiological Control Manual
REOP	Real Estate/Operations Permit
RMA	Radioactive Material Area
RPP	Radiation Protection Program
RSC.....	Radiation Safety Committee
RSM	Radiation Safety Manual
RSO	Radiation Safety Officer
RSPC	Radiological Safety Prime Contractor
RW-I	Radiological Worker I
RW-II	Radiological Worker II
RWP	Radiological Work Permit
SI	Systems International
SNJV	Stoller-Navarro Joint Venture
SNL	Sandia National Laboratories
SNL-NV	Sandia National Laboratories - Nevada
SSE	Senior Site Executive
STC.....	Special Tritium Compounds
SWAC	Site-Wide ALARA Committee
TA.....	Technical Area
TBD.....	Technical Basis Document
TED.....	Total Effective Dose
TEDE.....	Total Effective Dose Equivalent
TO	Tenant Organization

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UNR University of Nevada, Reno
WSI Wackenhut Services, Incorporated
WSI/NV Wackenhut Services, Incorporated/Nevada Operations
YMP Yucca Mountain Project

UNITS OF MEASUREMENT

Bq..... becquerel(s)
cm centimeter(s)
cm² square centimeter(s)
ft foot/feet
Gy..... Gray
m meter(s)
MeV mega-electronvolts
μCi/ml microcurie(s) per milliliter
μm micrometer(s)
mrem millirem
rad radiation absorbed dose
rem roentgen equivalent man
Sv sievert
yr year

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NEVADA TEST SITE RADIATION PROTECTION PROGRAM

1.0 PURPOSE

Title 10 Code of Federal Regulations (CFR) Part 835, "Occupational Radiation Protection," establishes radiation protection standards, limits, and program requirements for protecting individuals from ionizing radiation resulting from the conduct of U.S. Department of Energy (DOE) activities. 10 CFR 835.101(a) mandates that DOE activities be conducted in compliance with a documented Radiation Protection Program (RPP) as approved by DOE. This document promulgates the RPP for the Nevada Test Site (NTS), related (on-site or off-site) U.S. Department of Energy, National Nuclear Security Administration Nevada Site Office (NNSA/NSO) operations, and environmental restoration off-site projects.

2.0 COMMITMENT

The Tenant Organizations (TOs) participating in this NTS RPP commit to using the current version of the NV/YMP Radiological Control Manual (Bechtel Nevada, 2004¹) (NV/YMP RCM) as the primary means for ensuring a program of radiological excellence at NNSA/NSO facilities. Company policy statements, safety manuals, and procedures are tied to the NV/YMP RCM as a means to transfer directives to the working level. Only articles of the NV/YMP RCM specific to demonstrating compliance with 10 CFR 835 requirements are cited in Appendix H, "Compliance Demonstration Table," of this document. The NTS RPP establishes the policy by which each participating TO shall ensure that radiation doses to occupational workers are maintained within acceptable limits and as far below these limits as is reasonably achievable. The issuance of this document demonstrates the commitment of the participating NTS TOs to implement the requirements of this rule in the work place and in training programs, incorporating these requirements in appropriate documents and procedures. Each participating TO will conduct internal audits of their RPP in accordance with Appendix 1B of the NV/YMP RCM.

3.0 SCOPE

This NTS RPP promulgates the radiation protection standards, limits, and program requirements for occupational exposure to ionizing radiation resulting from NNSA/NSO activities at the NTS and other operational areas as stated in 10 CFR 835.1(a). NNSA/NSO activities (including design, construction, operation, and decommissioning) within the scope of this RPP may result in occupational exposures to radiation or radioactive material. Therefore, a system of control is implemented through specific references to the site-specific NV/YMP RCM. This system of control is intended to ensure that the following criteria are met: (1) occupational exposures are maintained as low as reasonably achievable (ALARA), (2) DOE's limiting values are not exceeded, (3) employees are aware of and are prepared to cope with emergency conditions, and (4) employees are not inadvertently exposed to radiation or radioactive material.

¹ Bechtel Nevada was the previous contractor responsible for the publishing of the NV/YMP RCM.

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Operational tasks with radiological implications within the scope of this NTS RPP are provided in the appendices of this document and are summarized below:

- Control of residual radioactive contamination including establishment and maintenance of radiologically controlled areas
- Radioactive waste storage, characterization, and disposal
- Environmental remediation operations that include decontamination and decommissioning activities, drilling and developing potentially contaminated wells, and sampling and characterizing radiologically contaminated media
- Dosimeter and instrument calibration
- Well logging
- Radiography
- Training exercises
- Experiments and tests
- Radioactive material receipt and handling
- Operation of radiation-generating devices and accelerators
- Maintenance of emergency response programs (e.g., Consequence Management Response Team/Federal Radiological Monitoring and Assessment Center, Aerial Measurements Services, Nuclear Emergency Support Team, Accident Response Group, and Radiological Assistance Program)
- Special activities supporting DOE worldwide

Tasks outside the scope of this RPP include:

- Radon and radon daughters, unless site selection is made or materials are introduced that enhance the concentration of the precursors of radon
- Exclusions as identified in 10 CFR 835.1
 - Activities that are regulated through a license by the Nuclear Regulatory Commission or a State under an Agreement with the Nuclear Regulatory Commission, including activities certified by the Nuclear Regulatory Commission under section 1701 of the Atomic Energy Act (Public Law 585-79)
 - Activities conducted under the authority of the Deputy Administrator for Naval Reactors, as described in Public Law 98-525 and 106-65
 - Activities conducted under the Nuclear Explosive and Weapons Surety Program relating to the prevention of accidental or unauthorized nuclear detonations
 - DOE activities conducted outside the United States on territory under the jurisdiction of a foreign government to the extent governed by occupational

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radiation protection requirements agreed to between the United States and the cognizant government

- Background radiation, radiation doses received as a patient for the purposes of medical diagnosis or therapy, or radiation doses received from voluntary participation as a subject in medical research programs
- Radioactive material on or within material, equipment, and real property that is approved for release when the radiological conditions of the material, equipment, and real property have been documented to comply with the criteria for release set forth in a DOE authorized limit that has been approved by a Secretarial Officer in consultation with the Chief Health, Safety and Security Officer
- Radioactive material transportation not performed by DOE or a DOE contractor.

However, occupational doses received as a result of excluded activities and radioactive material transportation, as listed in paragraph (b) (with the exception of (b)(5) and (b)(6)) of 10 CFR 835.1, shall be considered when determining compliance with the occupational dose limits of 10 CFR 835.202 and 10 CFR 835.207, and with the limits for the embryo/fetus of 10 CFR 835.206.

Occupational doses resulting from authorized emergency exposures and planned special exposures shall not be considered when determining compliance with the dose limits of 10 CFR 835.202 and 10 CFR 835.207

The requirements in subparts F and G of 10 CFR 835 do not apply to radioactive material transportation by DOE or a DOE contractor conducted under the continuous observation and control of an individual who is knowledgeable of and implements required exposure control measures, or in accordance with U.S. Department of Transportation regulations or DOE orders that govern such movements.

Except as provided in 10 CFR 835.101(h), any task outside the scope of this RPP shall not be initiated until an amendment of this RPP is approved by NNSA/NSO.

4.0 SITE DESCRIPTION

The NTS and the adjacent Yucca Mountain Project (YMP) are located in Nye County, Nevada. The NTS is located approximately 65 miles northwest of Las Vegas. It is a remote facility that covers approximately 1,375 square miles of land. The dimensions of the NTS vary from 28 to 35 miles in width (eastern to western border) and 40 to 55 miles in length (northern to southern border).

The NTS and YMP (located within and immediately adjacent to the western portion of NTS Area 25) are surrounded to the west, north, and east by additional thousands of acres of land withdrawn from the public domain for use as a protected wildlife range and as a military gunnery range. These public exclusion areas comprise the Nevada Test and Training Range and the Tonopah Test Range. These two areas provide a buffer

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zone between the test areas and public lands administered by the Bureau of Land Management.

The population density within Nye County, Nevada, is only 1.4 persons per square mile. The combination of the Nevada Test and Training Range and the NTS is one of the largest unpopulated land areas in the United States, comprising some 5,470 square miles. The open range surrounding the Nevada Test and Training Range is predominantly used for livestock grazing, mining, and recreation.

The NTS has been the primary location for testing nuclear explosives in the continental United States since 1951. The topographical and geological characteristics of the NTS afford some protection to the inhabitants of the surrounding areas from potential radiation exposure as a result of release of radioactivity or contamination from nuclear testing operations. Historically, testing programs at the NTS have included atmospheric testing in the 1950s and early 1960s; underground testing in drilled, vertical holes and horizontal tunnels; earth-cratering experiments; and nuclear rocket engine testing. Current activities include operating low-level radioactive and mixed waste disposal facilities; assembly and execution of subcritical experiments; confined critical experiments; assembly/disassembly of special experiments; operation of pulsed X-ray machines and neutron generators; accelerator experiments; development, testing, and evaluation of radiation detectors; surface cleanup and site characterization of contaminated land areas; environmental activity by the University of Nevada system; and non-nuclear test operations such as controlled spills of hazardous materials at the Nonproliferation Test and Evaluation Center.

YMP is involved with the characterization and suitability testing of a rolling volcanic ridge named "Yucca Mountain," located near the western boundary of the NTS, as the future repository for high-level radioactive waste generated within the United States. Current activities include test hole drilling and underground mining. The major potential for radiation exposure is from using sealed radioactive sources and possible future handling of radioactive waste.

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Figure 1. NTS Location

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Figure 2. NTS Area Designations, Principal Facilities, and Testing Areas

5.0 ORGANIZATIONAL RELATIONSHIPS

Activities at the NTS are diverse. They involve the application of many different skills and occupational specialties widely dispersed over a large geographical area. Several different organizations frequently perform work either as a closely integrated team or concurrently at any one location. In order to ensure that procedures and policies are uniformly considered and applied by all of the program participants, one organization is assigned radiological safety coordination responsibility by NNSA/NSO.

NTS radiological coordination responsibility for a facility, building, or complex is delegated to the TO by NNSA/NSO through NSO M 421.X-1B, "Nuclear Facility Safety Management" (an activity agreement); NSO M 412.X-1D, "Real Estate/Operations Permit"; and NSO O 412.X3B, "Work Control." Facilities not covered by activity agreements are delegated to the TO by NNSA/NSO through DOE Policy DOE P 450.4B, "Safety Management System Policy" (facility use permit). Radiological responsibility for any test location or other experimental development area is delegated by NNSA/NSO in writing.

National Security Technologies, LLC (NSTec), is presently responsible to NNSA/NSO (through the Management and Operating [M&O] contract) for the coordination of the radiological safety of NTS operations not specifically transferred to another organization. NSTec is currently serving as the Radiological Safety Prime Contractor (RSPC).

Each NTS TO maintains a Radiological Control Organization (RCO). Each RCO is managed by a designated Radiological Control Manager under the authority of the TO's Senior Site Executive (SSE). Each SSE and Radiological Control Manager has radiological safety coordination responsibility as directed by NNSA/NSO for the scope of work under their control. The Radiological Control Managers meet at least quarterly at the Radiological Control Managers' Council to establish NTS radiological control policy.

The following TOs are participating in this NTS RPP:

- NSTec, the M&O contractor for the NTS, performs radiological services to NTS contractors and users and operates under Contract No. DE-AC52-06NA25946.
- Lawrence Livermore National Laboratory (LLNL), national laboratory and site user, operates under Contract No. W7045-ENG-48.
- Los Alamos National Laboratory (LANL), national laboratory and site user, operates under Contract No. DE-AC52-06NA25396.
- Sandia National Laboratories (SNL), national laboratory and site user, is operated by Lockheed Martin under Contract No. DE-AC04-94AL85000.

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- Stoller-Navarro Joint Venture (SNJV), the prime contractor for Environmental Support Services at the NTS and other offsite locations for the Environmental Restoration Program, operates under Contract No. DE-AC52-03NA99205.
- Desert Research Institute (DRI), a nonprofit research campus of the Nevada System of Higher Education, operates under Contract No. DE-AC52-06NA26383.
- Wackenhut Services, Incorporated (WSI), the prime security contractor, operates under Contract No. DE-AC52-06NA14390.

6.0 RESPONSIBILITIES

The NTS RPP is organized into a format that provides information concerning the responsibilities and interrelationships among each of the participating TOs. Each TO participating in this RPP is responsible for complying with the requirements of 10 CFR 835 as described in the text of this RPP and their respective appendix that specifically addresses the program of that organization. Approval signatures from each participating organization's SSE for their respective appendix constitute concurrence and approval of this entire document.

The general rule of 10 CFR 835.3 states that no person or DOE personnel shall take or cause to be taken any action inconsistent with the requirements of: (1) this part or (2) any program, plan, schedule, or other process established by this part. With respect to a particular DOE activity, contractor management shall be responsible for compliance with the requirements of this RPP. Where there is no contractor for a DOE activity, DOE shall ensure implementation of and compliance with the requirements of this part. However, nothing in this RPP shall be construed as limiting actions that may be necessary to protect health and safety.

7.0 ALARA PROGRAM

Elements of a successful ALARA program include management commitment, administrative control levels for control of radiation exposure to workers, ALARA goals/radiological performance goals, ALARA design review where applicable, ALARA job/experiment planning review, and records of these ALARA program elements. The concept of optimizing protection lends itself to a program with formal elements, plans, and measures that, when implemented, serves to reduce radiation exposures as far below regulatory dose limits as is reasonably achievable. The NTS TOs are committed to conducting operations in a manner that protects the safety and health of their employees and the public, minimizes damage or loss to government- and company-owned property, and protects the environment. The TOs are further committed to ensuring that potential safety and health risks, such as exposure to ionizing radiation, are reduced to ALARA.

The NTS Contractors' Site-Wide ALARA Committee provides oversight of ALARA activities at the NTS. It is an independent, multi-organizational group that reviews

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performance and advises NTS contractor organizations on improving progress towards minimizing radiation exposure and radiological releases.

8.0 RADIATION PROTECTION PROGRAM REVISION

Since the important aspect of the NTS RPP is to protect the safety and health of its workers and members of the public, proposed changes that decrease the effectiveness of the RPP shall not be implemented without submittal to and approval by NNSA/NSO.

Any changes to either the NTS RPP text or the RSPC's Appendix A could affect the other individual appendices of this document. Consequently, any revisions of the NTS RPP text or Appendix A require approval signatures of the SSEs from all participating TOs.

Changes to the remaining appendices need only be approved by that participating TO's SSE if the changes do not decrease the effectiveness of the RPP. All changes must be submitted to NNSA/NSO for review and may be modified or rejected by NNSA/NSO.

9.0 APPENDICES

The following appendices describe each participating TO's RPP. The NTS is implementing the requirements of 10 CFR 835 through specific related requirements in the current NV/YMP RCM, as outlined in Appendix H of this document.

<u>Appendix</u>	<u>Organization</u>	<u>Senior Site Executive</u>
Appendix A	National Security Technologies, LLC	Dr. S. M. Younger
Appendix B	Lawrence Livermore National Laboratory	R. W. Braddy
Appendix C	Los Alamos National Laboratory	R. W. Braddy
Appendix D	Sandia National Laboratories	D. D. Thomson
Appendix E	Stoller-Navarro Joint Venture	T. D. Taylor
Appendix F	Desert Research Institute	Dr. C. G. Maples
Appendix G	Wackenhut Services, Incorporated	D. C. Bradley
Appendix H	All TOs	All

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REFERENCES

Bechtel Nevada, 2004. *NV/YMP Radiological Control Manual*, DOE/NV/11718--079. Las Vegas, NV.

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Nevada Site Office Manual NSO M 421.X-1B, "Nuclear Facility Safety Management."

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APPENDIX A

NATIONAL SECURITY TECHNOLOGIES, LLC

1.0 PURPOSE

National Security Technologies, LLC (NSTec), revises this Radiation Protection Program (RPP) as a result of an amendment by the U.S. Department of Energy (DOE) regarding Title 10 Code of Federal Regulations (CFR) Part 835, "Occupational Radiation Protection," requirements. DOE's amendments to 10 CFR 835 update its provisions to account for lessons learned from the initial adoption of these regulations, comments from the Defense Nuclear Facilities Safety Board and members of the public, and new recommendations from the International Commission on Radiological Protection (ICRP).

10 CFR 835 sets forth the nuclear safety requirements that provide radiological protection for DOE workers and members of the public in a controlled area at a DOE facility. DOE proposed 10 CFR 835 on December 9, 1991 (56 FR 64334), and published it as final on December 14, 1993 (58 FR 65458). DOE amended 10 CFR 835 on November 4, 1998 (63 FR 59662), and on November 28, 2006 (71 FR 68727). DOE proposed its latest amendment to 10 CFR 835 on August 10, 2006 (71 FR 45996). The final rule amends 10 CFR 835 dated June 8, 2007.

This document serves as the implementation plan and schedule to achieve compliance to the revisions prescribed by the final rule dated June 8, 2007.

This revised RPP, once approved, will be the governing document for implementation of the revised Rule, which will cause creation, revision, and/or deletion of existing company documents, as required, during the three year implementation process. The end result will be one fully implemented NSTec-wide Occupational Radiation Protection Program on or before July 1, 2010. Until such time that each company document is remedied, NSTec employees will be expected to comply with the current and approved company documents.

2.0 SCOPE

The Nevada Test Site (NTS) RPP applies to radiological protection activities conducted by NSTec. NSTec is designated by the U.S. Department of Energy, National Nuclear Security Administration Nevada Site Office (NNSA/NSO) as the NTS Radiological Safety Prime Contractor (RSPC) as well as the Management and Operating (M&O) Contractor. As the site M&O contractor, NSTec maintains the day-to-day NTS operations by performing the following services and functions:

- Construction
- Conventional weapons testing
- Development and manufacture of portable radiation detector systems
- Development and research
- Drilling research
- Emergency response training

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- Emergency response assets planning, maintenance, and deployment
- Environmental technologies studies
- Geophysical well logging
- Hazardous chemical spill testing
- Industrial radiography/materials testing
- Logistical support to user organizations
- Maintenance
- Mining research
- Radioactive waste storage, characterization, and disposal
- Seismic engineering research
- Staffs and supports emergency operations
- Testing and evaluation of radiation detectors and radiation detection systems
- Training
- Transportation
- Transuranic waste examination and characterization

As the RSPC, NSTec provides the following radiological support services:

- Calibration and maintenance of radiological instrumentation
- Demarcation of areas
- Dosimetry
- In-vitro bioassay
- Radioactive source and material accountability
- Radiological monitoring
- Radiological technical support
- Radiological work permit processes

NSTec also provides radiological control services for the on-site activities at the Yucca Mountain Repository in support of the U.S. Department of Energy Office of Civilian Radioactive Waste Management (DOE/OCRWM).

3.0 FACILITY DESCRIPTION

Radiological activities within the scope of 10 CFR 835 may be conducted in facilities and areas for which NSTec has been delegated safety coordination responsibility by NNSA/NSO and offsite operational areas as directed by NNSA/NSO.

Over the next approximately one year, NSTec will be assuming the maintenance and operations aspects of the facilities listed in Section 2 of Appendices B, C, and D of this RPP. These facilities will continue to be utilized by the laboratories to conduct experiments and other related activities as authorized through Secondary Real Estate/Operations Permits (REOPs). Under this configuration, NSTec will be delegated safety coordination responsibility for general facility activities and these responsibilities will continue to be delegated to the laboratory conducting projects for those portions of the facility and time frames described in the Secondary REOPs.

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NSTec performs radiological operations for NNSA/NSO in the following locations:

- Livermore Operations, Livermore, California
- Los Alamos Operations, Los Alamos, New Mexico
- North Las Vegas, Nevada
- NTS, Mercury, Nevada including contiguous portions of the Nellis Air Force Range Complex and Tonopah Test Range
- Remote Sensing Laboratory-Andrews, Suitland, Maryland
- Remote Sensing Laboratory-Nellis, Las Vegas, Nevada
- Special Technologies Laboratory, Santa Barbara, California
- Other various locations

NSTec also performs radiological operations for DOE/OCRWM at the Yucca Mountain Repository in Nevada.

4.0 HAZARD IDENTIFICATION

NSTec, as the prime M&O contractor, performs, among other activities, construction; drilling; engineering; laboratory analyses; waste storage, characterization, and disposal; transportation; and mining activities. Industrial health and safety hazards are addressed when planning, preparing for, and performing these activities.

NSTec deals with low specific activity radioactive materials that result in low exposures to alpha, beta, gamma, and neutron radiation. Residual contamination to soils from historical testing on the NTS result in a remote potential of internal uptake of radionuclides. Lower activity radioactive sources, in the nanocurie-to-millicurie range, are generally used for instrument operability and calibration checks. These sources result in little potential for personnel radiation exposure.

The potential for higher levels of radiation exposure to personnel exists as a result of using quantities of fissile material that potentially constitute a critical mass, sealed radioactive sources in the millicurie-to-kilocurie range, radiation-generating devices, and experimental equipment. Higher activity sources and radiation-generating devices, including accelerators, are used for industrial radiography, instrumentation calibration and testing, geophysical well logging, and materials and experimental testing.

Employee access to Radiation Areas and High Radiation Areas is governed by physical and/or strict administrative controls. Such measures include use of shielded containers and/or rooms with interlocks, alarms, and other devices to prevent exposure to high levels of radiation. Any source with detectable leakage of radioactive material will be controlled commensurate with the hazard.

5.0 ALARA COMMITMENT

NSTec's commitment of continuing improvement is essential to excellence in radiological control and maintaining radiation exposures as low as reasonably achievable (ALARA). Plans and measures for applying ALARA include the incorporation of ALARA processes in work planning, independent review of work plans

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and operations to ensure adequacy of ALARA provisions and performance, and development and tracking of company ALARA goals. NSTec maintains its own ALARA committee and is also a participating member of the NTS Contractors' Site-Wide ALARA Committee. By company procedure, NSTec assigns responsibilities and establishes methods for ensuring that radiation exposure is limited to the lowest level reasonably achievable. This procedure provides for the appointment of an ALARA Committee and describes methods of monitoring, controlling, and documenting radiation exposure to employees and the general public. Radiation exposure of the work force and public is controlled such that radiation exposures are well below regulatory limits, and there is no radiation exposure without commensurate benefits. During routine operations, combinations of administrative control procedures, radiological work permits, design features, engineering controls, and training are used to keep exposure levels ALARA. Each NSTec employee involved in radiological work is expected to demonstrate responsibility and accountability through an informed, disciplined, and cautious attitude toward radiation. This results in excellent performance of the ALARA processes, as evidenced by a program in which radiation exposures are maintained well below regulatory limits, contamination is minimized, and radiological spills or uncontrolled releases are prevented.

6.0 EXCLUSIONS

Radioactive materials transported to and from the NTS in support of NSTec operations shall be packaged, surveyed, and shipped in accordance with the U.S. Department of Transportation (DOT) regulations. NSTec will adhere to DOT requirements or the requirements of the NTS Transportation Safety Document (once approved). NSTec will conduct monitoring in accordance with 10 CFR 835.405(b) upon initial receipt of radioactive material shipments from a common carrier at the NTS; however, NSTec will not conduct additional monitoring when a radioactive material shipment occurs between facilities within the boundaries of the NTS. For example, when a radioactive material shipment is received from a common carrier at the NSTec warehouse, the Radiological Control Department is notified and a receipt survey is performed if required by 10 CFR 835.405. If that shipment is then transferred to another NTS location, another receipt survey is not performed, unless some visible damage has occurred to the package in such transfer.

7.0 IMPLEMENTATION SCHEDULE AND PLAN

NSTec is not currently in compliance with the following requirements of 10 CFR 835 as revised: 10 CFR 835.1, 10 CFR 835.2, 10 CFR 835.4, 10 CFR 835.101, 202, 203, 205, 206, 401, 402, 405, 502, 602, 606, 702, 1001, 1003, 1202, 1301, Appendix A, Appendix C, Appendix D, and Appendix E. Program modifications will be developed as needed, and the NV/YMP Radiological Control Manual (NV/YMP RCM) (Bechtel Nevada, 2004¹) and/or NSTec performance documents will be revised and provided to NNSA/NSO to demonstrate compliance with these requirements by July 2010.

¹ Bechtel Nevada was the previous RSPC responsible for the publishing of the NV/YMP RCM.

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During the implementation period established in the updated regulation, NTS will consider the terms defined in the updated regulation to be equivalent as follows:

Existing Term	Equivalent Term
Committed effective dose equivalent	Committed effective dose
Committed dose equivalent	Committed equivalent dose
Cumulative total effective dose equivalent	Cumulative total effective dose
Dose equivalent	Equivalent dose
Effective dose equivalent	Effective dose
Quality factor	Radiation weighting factor
Weighting factor	Tissue weighting factor
Total effective dose equivalent	Total effective dose

Deleted Terms (Not defined in ICRP 60 or ICRP 68)	Replacement Terms
Deep dose equivalent	Equivalent dose to the whole body
Shallow dose equivalent	Equivalent dose to the skin or to an extremity
Lens of the eye dose equivalent	Equivalent dose to the lens of the eye

8.0 SUMMARY

NSTec will gain full compliance with the amended 10 CFR 835 as demonstrated in Appendices A and H by July 2010.

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APPENDIX B

LAWRENCE LIVERMORE NATIONAL LABORATORY

1.0 SCOPE

The Nevada Test Site (NTS) Radiation Protection Program (RPP) applies to radiological protection activities conducted by Lawrence Livermore National Laboratory (LLNL) at the NTS.

The Lawrence Livermore National Laboratory-Nevada (LLNL-N) activities within the scope of this NTS RPP are: (1) assembly, disassembly, interim staging, retrofitting, or inspection of nuclear explosive devices, subcritical experiments, components, simulated components, or weapons; (2) 9-mega-electronvolts (MeV) linear accelerator (LINAC), Cobalt-60 or Iridium-192 industrial radiography of nuclear explosive devices, subcritical experiments components, simulated components, or weapons; (3) packaging and handling of radioactive material shipments; (4) operation of radiation-producing machines or use of radioactive sources associated with operational checks of portable radiological instrumentation or with diagnostic or laboratory experiments; (5) use of sealed radioactive sources for the purpose of logging vertical or horizontal holes or use in other field experiments; and (6) gas gun-type experiments (e.g., plutonium and uranium).

LLNL-N does not provide radiological control/support for any LLNL-Yucca Mountain Project (YMP) activities at the NTS. All LLNL-YMP radiological activities are outside the scope of this RPP. LLNL employees assigned to YMP follow the Civilian Radioactive Waste Management System/Management and Operating Contractor/YMP RPP.

Planned special exposures (Title 10 Code of Federal Regulations [CFR] Part 835.204) are beyond the scope of LLNL operations at the NTS. Unless specifically addressed in Appendix H, 10 CFR 835.402, 10 CFR 835.702, 10 CFR 835.703, and 10 CFR 835.1304 requirements are addressed by National Security Technologies, LLC (NSTec), in Appendix A. NSTec provides U.S. Department of Energy (DOE) Laboratory Accreditation Program accredited personnel dosimetry, nuclear accident dosimetry (once developed), radiobioassay, internal dose assessments, recording personnel doses, and calibration of instrumentation in support of LLNL operations at the NTS.

General employee and radiological worker training courses are given to LLNL employees by NSTec or LLNL. NSTec and LLNL have the responsibility for developing the courses in accordance with DOE requirements. LLNL-N maintains the appropriate records in the NTS database.

LLNL and Los Alamos National Laboratory (LANL) are integrated in the Joint Nevada Program Office (JNPO). For the purpose of this RPP, LLNL and LANL are submitting separate columns in the RPP table to ensure that responsibilities of each are clearly described. The RPPs for LLNL and LANL are similar except when the home laboratory's procedures or processes are needed to complete the requirements.

2.0 FACILITY DESCRIPTION

Radiological activities within the scope of 10 CFR 835 may be conducted in the following facilities and areas for which LLNL has been delegated safety coordination responsibility by the U.S. Department of Energy, National Nuclear Security Administration Nevada Site Office (NNSA/NSO) under the requirements of NTS activity agreements:

- Area 6, Building Control Point (CP)-60 is the site of LLNL's high pressure and gas systems test facility. LLNL may have experiments in the future that use radioactive materials in this facility.
- Area 6, Device Assembly Facility (DAF) is a JNPO facility shared by LANL and LLNL. Assembly, disassembly, retrofitting, and inspection of nuclear explosive devices or experiments are conducted by LLNL at DAF. Interim staging of weapons are conducted by LLNL at DAF. Industrial radiography is conducted by the JNPO using the 9-MeV LINAC, a sealed Cobalt-60 or an Iridium-192 radiography source, or other industrial-type radiography unit.
- Area 6, U1a Complex is a LANL underground drift complex connected to the surface by an approximately 1,000 foot shaft/man hoist access at U1a (main access) and U1g (emergency access). LLNL may use this facility to field subcritical experiments using weapon's grade plutonium, associated diagnostics experiments, and radiation-generating devices to assess the performance of subcritical experiments.
- Area 6, Wet & Wild, K Compound is a JNPO facility used for storage of radioactive materials, potential radioactive waste, and potentially internally contaminated equipment.
- Area 4, Big Explosives Experimental Facility is the site of high-explosive experiments. LLNL has occasional experiments that use radioactive materials at this facility.
- Area 12, Core Library houses post-shot core samples collected from previous nuclear tests. This facility is used for storage purposes only and is rarely occupied.
- Area 23, Building 600 houses the LLNL-N organization. This facility is used for office space, staging operations, and radioactive source storage.
- Area 23, Building 128 is the LLNL-N warehousing facility. All radioactive material shipments received from offsite or sent offsite are staged/handled in this facility, excluding radioactive material shipments from a courier/safe secure transport to or from Area 27 or the DAF.
- Area 27, Able Compound is an LLNL facility that contains the Joint Actinide Shock Physics Experimental Research (JASPER) buildings. LLNL conducts gas-gun type experiments conducted for JASPER that use radioactive materials.
- Area 27, Baker Compound is an LLNL high explosive storage and staging facility. Radioactive materials are also stored and handled in this facility.

3.0 HAZARD IDENTIFICATION

Assembly, disassembly, interim staging, retrofitting, and inspection of nuclear explosive devices, subcritical experiments, or other physics experiments involve work in Radiation Areas and potential work in Contamination Areas. The Radiation Areas may include both beta/gamma and neutron radiation fields. Contamination Areas may be the result of handling radioactive materials in the assembly bays.

Industrial radiography involves the generation of a Radiation or High Radiation Area, in the case of the sealed Cobalt-60 source or an Iridium-192 source, and a Very High Radiation Area, in the case of the 9-MeV LINAC. However, the Very High Radiation Areas are personnel exclusion areas, and no personnel access is permitted. Personnel radiation exposure is anticipated to be well below the administrative control level from these activities.

Packaging, handling, and transportation of radioactive material shipments may involve work in a Contamination Area or a Radiation Area with exposure occurring to the hands and the whole body. Radiation Area, Contamination Area, and Radioactive Material Area postings are used as required.

Radiation-producing machines operated for diagnostic experiments and line-of-sight X-ray machines may produce a Radiation Area. However, LLNL does not permit personnel access to these Radiation Areas. Radioactive “check” sources are used to operationally check portable radiological instrumentation. Radioactive Material Area postings are used as required. Personnel radiation exposure for both of these operations is anticipated to be well below the administrative control level from these activities.

Operation of neutron and gamma well logging sources involves work in a Radiation Area with exposure occurring to the hands. Radiation Area postings are required.

Handling of radioactive cores and associated debris involves work in a Radiation Area and potential work in a Contamination Area with exposure occurring to the hands and the whole body. Radiation Area and Contamination Area postings are used as required.

Gas-gun type experiments may involve operations in Contamination Areas and High Contamination Areas with exposure occurring by internal uptakes. Contamination Area or High Contamination Area postings are used as required.

4.0 ALARA COMMITMENT

The as low as reasonably achievable (ALARA) policy results from the well-recognized practice in the scientific and radiation protection community of avoiding unnecessary exposure to ionizing radiation. The International Commission on Radiological Protection (ICRP) states that all exposure shall be kept ALARA, taking into account economic and social factors (ICRP 60). The concept of optimizing protection lends itself to a program description with formal elements, plans, and measures that, when implemented, serves

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to reduce radiation exposures as far below regulatory dose limits as is reasonably achievable. LLNL-N conducts research programs that involve radioactive materials and ionizing-radiation-producing devices. The policy is to conduct operations in such a way that radiation exposure to LLNL employees, employees of other organizations, and the public be kept ALARA. The details of the ALARA policy are outlined in LLNL Environment, Safety & Health Manual, Volume 6, Document 62.1, "Nevada Test Site Occupational Radiation Protection."

Elements of a successful ALARA program include management commitment, ALARA training for employees/workers, administrative control levels for control of radiation exposure to workers, ALARA goals/radiological performance goals, ALARA design review where applicable, ALARA job/experiment planning review, and records of these ALARA program elements.

5.0 EXCLUSIONS

Generally, LLNL-N activities or operations within the scope of the exclusions listed in 10 CFR 835.1(b) are not included in this RPP. However, LLNL-N does conduct activities on the NTS pursuant to 10 CFR 835.1(b)(3) and 10 CFR 835.1(b)(4), which requires LLNL-N to use these two exclusions:

- LLNL-N does conduct operations under the purview of the Nuclear Explosive and Weapons Surety Program at the DAF and U1a Complex, which requires the use of exclusion 10 CFR 835.1(b)(3). Requirements established in 10 CFR 835 that, if performed, would violate the requirements of the Nuclear Explosive and Weapons Surety Program shall not be implemented. For example, radiological portable monitoring instrumentation may not be brought into contact with an assembly during some stages of the operation. Alternatively, radioactive contamination surveys of items are conducted prior to starting assembly operations, and swipe surveys are conducted periodically during the assembly.
- LLNL-N does conduct radioactive material transportation operations on the NTS which requires the use of exclusion 10 CFR 835.1(b)(4). Until a radioactive material shipment is released from an LLNL-N facility, the requirements of 10 CFR 835 will be followed. For off-site shipments (leaving the NTS), LLNL-N will adhere to the requirements of the U.S. Department of Transportation (DOT). For on-site shipments (within the boundaries of the NTS), LLNL-N will adhere to DOT requirements or the requirements of the NTS Transportation Safety Document (once approved). Once a radioactive material shipment is received at an LLNL-N facility, LLNL-N will follow the requirements of 10 CFR 835. However, due to the use of this exclusion, LLNL-N will not conduct monitoring in accordance with 10 CFR 835.405(b) when receiving radioactive material shipments between LLNL-N facilities within the boundaries of the NTS.

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6.0 IMPLEMENTATION SCHEDULE AND PLAN

10 CFR 835 was recently revised. As a result, LLNL-N is not currently fully in compliance with the following requirements of 10 CFR 835 as revised: 10 CFR 835.1, 10 CFR 835.2, 10 CFR 835.4, 10 CFR 835.101, 202, 203, 205, 206, 401, 402, 405, 502, 602, 606, 702, 1001, 1003, 1202, 1301, Appendix A, Appendix C, Appendix D, and Appendix E. Program modifications will be developed as needed, and the NV/YMP Radiological Control Manual (NV/YMP RCM) (Bechtel Nevada, 2004¹) and/or LLNL-N documents will be revised and provided to NNSA/NSO to demonstrate compliance with these requirements by July 2010.

During the implementation period established in the updated regulation, NTS will consider the terms defined in the updated regulation to be equivalent as follows:

Existing Term	Equivalent Term
Committed effective dose equivalent	Committed effective dose
Committed dose equivalent	Committed equivalent dose
Cumulative total effective dose equivalent	Cumulative total effective dose
Dose equivalent	Equivalent dose
Effective dose equivalent	Effective dose
Quality factor	Radiation weighting factor
Weighting factor	Tissue weighting factor
Total effective dose equivalent	Total effective dose

Deleted Terms (Not defined in ICRP 60 or ICRP 68)	Replacement Terms
Deep dose equivalent	Equivalent dose to the whole body
Shallow dose equivalent	Equivalent dose to the skin or to an extremity
Lens of the eye dose equivalent	Equivalent dose to the lens of the eye

¹ Bechtel Nevada was the previous primary contractor responsible for the publishing of the NV/YMP RCM.

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APPENDIX C

LOS ALAMOS NATIONAL LABORATORY

1.0 SCOPE

Radiological protection activities at the Nevada Test Site (NTS) are performed by Los Alamos National Laboratory (LANL) in accordance with Title 10 Code of Federal Regulations (CFR) Part 835, "Occupational Radiation Protection," as described in this Appendix and in the Appendix H table for activities performed under a Joint Nevada Program Office (JNPO)-LANL Primary or Secondary Real Estate/Operations Permit (REOP).

The Lawrence Livermore National Laboratory (LLNL) and LANL/NTS radiation protection organizations are united under the JNPO. However, for the purpose of commitment to compliance with 10 CFR 835 through the NTS Radiation Protection Program (RPP) and identification of applicable Home Laboratory programs, LLNL and LANL have developed separate columns in Appendix H to ensure that the responsibilities of each are clearly described.

As the Radiation Safety Prime Contractor (RSPC) for the NTS, National Security Technologies, LLC (NSTec), is responsible for providing, in compliance with 10 CFR 835, core radiation protection services for the Tenant Organizations (TOs).

The 10 CFR 835 requirements that are implemented by the RSPC on behalf of the NTS TOs are identified in the Appendix H table and are outside the scope of LANL/NTS work. The 10 CFR 835 requirements that are implemented by the LANL Home Laboratory under the Los Alamos RPP on behalf of LANL/NTS are identified in the Appendix H table and are outside the scope of LANL/NTS work. The NTS RPP does not cover LANL activities conducted at the Yucca Mountain Project.

The RSPC provides the following radiological support services to the NTS TOs in compliance with 10 CFR 835 as described in Appendix H:

- Qualified radiological control technicians
- Radiological survey and swipe counting
- Personnel decontamination facilities
- Radiological control technician and site-monitoring services
- External and internal dosimetry
- Nuclear Accident Dosimetry (once developed)
- Radiological instruments, maintenance, and calibration
- Radiological safety training
- Accountable sealed radioactive source control program

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The LANL/NTS activities within the scope of this NTS RPP are:

- Nuclear material handling and measurement
- Assembly, disassembly, staging, insertion, and inspection of devices or experiments consisting of or containing depleted thorium, uranium, tritium, natural uranium, enriched uranium, special nuclear materials, and other transuranic nuclides
- Operation of radiation-generating devices and sealed source radiography of device or experiment components and completed assemblies
- Packing, unpacking, on-site transportation, and warehousing/handling of radioactive material shipments
- Instrument calibration and response studies with radioactive sources and radioactive materials
- Screening analysis of operational radiological samples containing alpha, beta, and/or gamma-emitting nuclides, including tritium
- Operation of radiation-generating devices for the purpose of diagnostic experimentation and radiography
- Radiation source handling and storage
- Post-experiment U1a drift complex and experiment area reentry operations

2.0 FACILITY DESCRIPTION

LANL is responsible for implementation of 10 CFR 835 requirements in accordance with this RPP for facilities held under a Primary or Secondary REOP per NSO M 412.X-1D, "Real Estate/Operations Permit," as a component of safety coordination responsibility. As examples, LANL performs work under a Primary and/or Secondary REOP at the following facilities:

- Area 6, Buildings Control Point (CP)-95A houses the LANL/NTS radiological control organization. These facilities are used for staging/use of radiological monitoring instrumentation, radioactive source storage/use, and preparation/radiological assessment of samples.
- Area 6, Building CP-100 is the JNPO warehousing facility. Radioactive material shipments are staged at this facility for off-site shipment or delivery to other facilities on the NTS. CP-111 is an unoccupied storage bunker located within the CP-100 fenced compound.
- Area 6, Device Assembly Facility (DAF). Assembly, disassembly, staging, and inspection of devices or experiments are conducted in the DAF under Secondary

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REOPs. This may include work in the Downdraft Table Building. Radiography is conducted with radiation-producing devices and/or sealed sources.

- Area 6, DAF, Technical Area (TA)-18. LANL project operations include nuclear material handling and measurement, radiography with radiation-producing devices, and handling of medical, industrial, and sealed radiation sources under a Secondary REOP.
- Area 6, U1a Complex is an underground drift complex connected to the surface by an approximately 1,000 foot shaft/man hoist access at U1a, U1h, and U1g (emergency access only). The test bed for LANL experiments containing weapon's grade plutonium and other radioactive materials is located in the underground portion of the complex. Diagnostic experiments, including radiation-generating devices, are also fielded in the U1a Complex to assess the performance of the main experiment.
- Area 6, U6c is an example of a test bed for LANL experiments located at a vertical emplacement ground zero complex. Diagnostic experiments will also be fielded at U6c and similar test beds to assess the performance of the main experiment.
- Area 11, Los Alamos Technical Facility. Radioactive materials and sealed radiation sources are staged and used at this facility.

Additional areas and NTS facilities may be identified for future LANL projects. However, the scope of activities at these areas and facilities would be as described above.

3.0 HAZARD IDENTIFICATION

TA-18 nuclear material handling and measurement may involve work in Radiation or High Radiation Areas, and potential work in Contamination or High Contamination Areas. The Radiation and High Radiation Areas may include both beta/gamma and neutron radiation fields.

Assembly, disassembly, staging, and inspection of devices or experiments containing special nuclear material, uranium, tritium, and/or other transuranic nuclides may involve work in Radiation or High Radiation Areas, and potential work in Contamination or High Contamination Areas.

Radiography involves the generation of a High or Very High Radiation Area in the case of both sealed sources and radiation-generating devices. Very High Radiation Areas are personnel exclusion areas, and no personnel access is permitted.

Packing, unpacking, and warehousing/handling involves radioactive material shipments. Radioactive Material and Radiation Areas are posted as required.

Radiological screening analysis of operational samples involves work with radioactive materials and radioactive calibration sources in an area posted as a Radioactive Material Area.

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Radiation-generating devices operated as diagnostic experiments produce Radiation, High Radiation, or Very High Radiation Areas attributable to neutron and/or photon fields. Very High Radiation Areas are personnel exclusion areas, and personnel access is not permitted.

4.0 ALARA COMMITMENT

The as low as reasonably achievable (ALARA) policy results from the well-recognized practice in the scientific and radiation protection community of avoiding unnecessary exposure to ionizing radiation. Exposure shall be kept ALARA, with economic and social factors being taken into account. The concept of optimizing protection lends itself to a description as a program with formal elements, plans, and measures that, when implemented, serves to reduce radiation exposures as far below regulatory dose limits as is reasonably achievable. LANL/NTS conducts research programs that involve radioactive materials and ionizing-radiation-producing devices. The LANL/NTS policy is to review and plan activities to assure that operations are conducted in such a way that radiation exposure to LANL employees, employees of other organizations, and the public be kept ALARA.

5.0 EXCLUSIONS

Exclusion 835.1(b)(3): The requirements of 10 CFR 835 that, if performed, would violate Nuclear Explosive Safety Study requirements or DAF explosive safety procedures shall not be implemented. For example, radiation monitoring instrumentation may not be brought in contact with and must remain at least 1 foot away from an assembly containing nuclear materials and explosives. Alternatively, radioactive contamination surveys of items are conducted prior to their introduction into the explosives assembly area, and swipe surveys are conducted periodically during the assembly.

Exclusion 835.1(b)(5): Background radiation and radiation doses received as a patient for the purposes of medical diagnosis or therapy are excluded from consideration as occupational radiation exposure.

Exclusion 835.1(b)(7): Radioactive material transportation that is not performed by the U.S. Department of Energy (DOE), National Nuclear Security Administration Nevada Site Office, or a DOE contractor is excluded.

6.0 IMPLEMENTATION SCHEDULE AND PLAN

LANL/NTS is not currently in compliance with the following requirements of 10 CFR 835 as revised: 10 CFR 835.2, 4, 101, 405, 606, Appendix A, Appendix C, Appendix D, and Appendix E.

Program modifications will be developed as needed, and the NV/YMP Radiological Control Manual (NV/YMP RCM) (Bechtel Nevada, 2004¹) and/or LANL/NTS procedures will be revised and provided to NNSA/NSO to demonstrate compliance with these requirements by July 2010. Procedure updates are required to incorporate 10 CFR 835

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changes in personnel dose nomenclature and derived air concentration values. References and procedures based on the RSPC's Internal and External Dosimetry Technical Basis Documents (TBDs) cannot be updated until the TBDs are updated. LANL/NTS procedures will be updated in accordance with the following:

ACTIVITY	COMPLETION DATE
Incorporate personnel dose nomenclature in procedures.	July 9, 2010
Incorporate changes to DAC values in procedures.	July 9, 2010
Incorporate changes to RSPC Internal Dosimetry TBD work place indicators in procedures.	July 9, 2010

During the implementation period established in the updated regulation, NTS will consider the terms defined in the updated regulation to be equivalent as follows:

Existing Term	Equivalent Term
Committed effective dose equivalent	Committed effective dose
Committed dose equivalent	Committed equivalent dose
Cumulative total effective dose equivalent	Cumulative total effective dose
Dose equivalent	Equivalent dose
Effective dose equivalent	Effective dose
Quality factor	Radiation weighting factor
Weighting factor	Tissue weighting factor
Total effective dose equivalent	Total effective dose

Deleted Terms (Not defined in ICRP 60 or ICRP 68)	Replacement Terms
Deep dose equivalent	Equivalent dose to the whole body
Shallow dose equivalent	Equivalent dose to the skin or to an extremity
Lens of the eye dose equivalent	Equivalent dose to the lens of the eye

¹ Bechtel Nevada was the previous RSPC responsible for the publishing of the NV/YMP RCM.

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APPENDIX D

SANDIA NATIONAL LABORATORIES

1.0 SCOPE

Appendix D of the Nevada Test Site (NTS) Radiation Protection Program (RPP) applies to activities conducted by Sandia National Laboratories (SNL) at the NTS. It includes the associated radiological protection activities conducted by SNL and the radiological control support provided through the NTS Radiological Safety Prime Contractor (RSPC), which is currently National Security Technologies, LLC (NSTec).

The SNL-Nevada (NV) activities within the scope of this NTS RPP are (1) receiving, storage, and inventory of special nuclear material and (2) work with and around radiation-generating devices.

SNL personnel provide oversight of the radiological protection program conducted in support of SNL-NV activities at the NTS with responsibility to review survey and monitoring records to assure that the requirements of Title 10 Code of Federal Regulations (CFR) Part 835, "Occupational Radiation Protection," are being met in SNL's radiation control program. The RSPC provides trained radiological control technicians for all monitoring, surveying, and posting activities required by SNL-NV; provides radioactive source control, inventory, and leak testing services; provides radioanalytical laboratory capability for sample analysis; provides instrument calibration services for all stationary and permanent instrumentation used for SNL-NV support; provides U.S. Department of Energy Laboratory Accreditation Program (DOELAP)-accredited external dosimetry for SNL personnel; and performs internal dose assessments for SNL personnel whenever the bioassay sampling has been done at the NTS. Since all radiological support functions are provided through the RSPC, SNL activities at the NTS are conducted utilizing the standard operating procedures of the RSPC, supplemented by the corporate SNL Environment, Safety, and Health (ES&H) Manual (SNL, 1991) and job-specific standard operating procedures or radiation work permits. All records generated in the performance of these services are maintained and archived by the RSPC.

Since SNL personnel working at the NTS are a mixture of personnel permanently assigned to the NTS and personnel on temporary duty status from the Albuquerque or Livermore facilities, general employee and radiological worker training may be obtained at any of the three locations. Radiological worker training received at the NTS is provided by NSTec training personnel; training received in Albuquerque or Livermore is supplemented by site-specific training provided by the SNL-NV ES&H staff, either by oral presentation or a pamphlet. Development of the course materials in accordance with U.S. Department of Energy (DOE) requirements is the responsibility of the organization providing the training. The SNL-NV ES&H staff are responsible for providing the appropriate information to the NSTec Training Department to update the NTS database for SNL-NV personnel.

The RSPC provides DOELAP-accredited external dosimetry services and DOELAP-accredited laboratory analyses of bioassay samples for internal dose assessment.

SNL-NV ES&H personnel shall identify the SNL personnel who require these dosimetry services; NSTec Dosimetry shall retain and archive all records generated in performing these dose assessments. Any positive radiation doses received by SNL personnel at the NTS shall be reported to the Sandia Dosimetry Records organization in Albuquerque for inclusion in the individual's occupational dose record. All reporting of dosimetry information to individuals shall remain a responsibility of the Sandia Dosimetry organization in Albuquerque.

2.0 FACILITY DESCRIPTION

Radiological activities within the scope of 10 CFR 835 may be conducted in, but are not limited to, the following facilities and areas for which SNL has been delegated safety coordination responsibility by the U.S. Department of Energy, National Nuclear Security Administration Nevada Site Office (NNSA/NSO):

- Area 6, Building Control Point (CP)-1 houses the SNL-NV arming and firing personnel and provides space for equipment maintenance, a vault for storage of classified components, data acquisition and recording facilities, and general office space.
- Area 23, Building 600 provides office space for resident administrative, technical, and support staff for SNL-NV NTS operations.

All radioactive material shipments received from offsite or sent offsite are received or shipped by the RSPC.

3.0 HAZARD IDENTIFICATION

SNL personnel are involved with radiation-generating devices while performing experiment and equipment setup and recovery activities. While participating in these operations, personnel are potentially exposed to X-ray, gamma, beta, alpha, or neutron radiation in High and Very High Radiation Areas. Employees are protected from these sources by strict administrative controls and by utilizing shielded installations with interlocks, alarms, and other devices to prevent exposure to high levels of radiation. Radioactive material shipments and work with and storage of radioactive and radioactively contaminated materials may involve work in a Contamination or Radiation Area with exposure to the hands and whole body. Radiation Area, Contamination Area, Airborne Radioactivity Area, and Radioactive Material Area postings are used as required. The potential exists for these activities to result in low-level contamination of personnel or facilities and internal and external radiation exposure. Personnel radiation exposure from these activities is anticipated to be well below the administrative control level.

4.0 ALARA COMMITMENT

SNL management at the NTS is fully committed to reducing radiation exposures to SNL personnel and to the general public to the lowest practicable levels. The goal is to provide positive control of radioactive materials and radiation-generating devices so that

radiation doses to occupational workers and the public are minimized and radioactive materials do not leave authorized work areas. The primary control of radiation exposures remains with the individual and with the individual's supervisor, and radiological safety training is the primary mechanism by which the concept of maintaining personnel radiation dose equivalents as low as reasonably achievable (ALARA) is passed on to the individual.

Since the potential for SNL personnel at the NTS to be exposed to ionizing radiation is extremely low, SNL-NV ES&H personnel participate in the NTS Contractors' Site-Wide ALARA Committee (SWAC) to effect their NTS ALARA program. Any SNL activity that has the potential to exceed NTS administrative limits shall be reviewed by the NTS Contractors' SWAC before being instituted. Thus, the SNL ALARA program includes management commitment, ALARA training for employees/workers, administrative control levels, and job/experiment planning review. The minutes of the NTS Contractors' SWAC meetings constitute the record of these ALARA program elements.

5.0 EXCLUSIONS

Radioactive materials transported to and from the NTS in support of SNL operations shall be packaged and shipped in compliance with U.S. Department of Transportation (DOT) regulations. However, SNL retains the option of requesting a deviation or exemption from DOT regulations for on-site transfer of radioactive materials. This would include, but is not limited to, the lack of receipt surveys of a package at a final SNL/NTS location. For example, when a radioactive material shipment is received from a common carrier at the SNL receiving area, NSTec's Radiological Control Department is notified and a receipt survey is performed. If that shipment is then transferred to another SNL location, another receipt survey is not accomplished unless visible damage has occurred to the package in such transfer. Conversely, because the potential for contamination is vanishingly small, and the hazard to the general population is negligible, some radioactive materials might be transferred onsite and will be packaged and shipped according to the RSPC on- and off-site transportation program for radioactive material. All on-site transfers of radioactive material by SNL are accomplished utilizing RSPC drivers trained according to the requirements of Title 49 CFR, "Transportation."

6.0 IMPLEMENTATION SCHEDULE AND PLAN

SNL is in compliance with applicable sections of 10 CFR 835 (dated November 4, 1998). 10 CFR 835 was updated on June 8, 2007. As a result, SNL is not fully in compliance with the following requirements of the updated 10 CFR 835 as applicable to SNL (see Appendix H for areas of applicability): 10 CFR 835.1, 10 CFR 835.2, 10 CFR 835.4, 10 CFR 835.101, 202, 203, 205, 206, 401, 402, 405, 502, 602, 606, 702, 1001, 1003, 1202, 1301, Appendix A, Appendix C, Appendix D, and Appendix E. Since SNL utilizes the RSPC for radiological services for activities conducted on the NTS, compliance depends on the RSPC schedule for implementation as described in Appendix A of this RPP. Program modifications will be developed as needed, and the

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NV/YMP Radiological Control Manual (NV/YMP RCM) (Bechtel Nevada, 2004¹) and/or other performance documents will be revised and provided to NNSA/NSO to demonstrate compliance with these requirements by July 2010.

During the implementation period established in the updated regulation, NTS will consider the terms defined in the updated regulation to be equivalent as follows:

Existing Term	Equivalent Term
Committed effective dose equivalent	Committed effective dose
Committed dose equivalent	Committed equivalent dose
Cumulative total effective dose equivalent	Cumulative total effective dose
Dose equivalent	Equivalent dose
Effective dose equivalent	Effective dose
Quality factor	Radiation weighting factor
Weighting factor	Tissue weighting factor
Total effective dose equivalent	Total effective dose

Deleted Terms (Not defined in ICRP 60 or ICRP 68)	Replacement Terms
Deep dose equivalent	Equivalent dose to the whole body
Shallow dose equivalent	Equivalent dose to the skin or to an extremity
Lens of the eye dose equivalent	Equivalent dose to the lens of the eye

¹ Bechtel Nevada was the previous RSPC responsible for the publishing of the NV/YMP RCM.

APPENDIX E

STOLLER-NAVARRO JOINT VENTURE

1.0 SCOPE

Title 10 Code of Federal Regulations (CFR) Part 835, "Occupational Radiation Protection," establishes radiation protection standards, limits, and program requirements to protect individuals from ionizing radiation that results from the conduct of U.S. Department of Energy (DOE) activities. Subsection 835.101(a) mandates that DOE activities be conducted in compliance with a documented Radiation Protection Program (RPP) as approved by DOE. This document promulgates the RPP for radiological activities conducted by Stoller-Navarro Joint Venture (SNJV) at the Nevada Test Site (NTS), related DOE sites, U.S. Department of Energy, National Nuclear Security Administration Nevada Site Office (NNSA/NSO) operations, and DOE environmental restoration projects.

The NTS RPP, which incorporates the SNJV RPP, applies to radiological activities conducted by SNJV at the direction of the DOE Nevada Environmental Restoration Program (NV ERP) at the NTS and other locations. SNJV is committed to using integrated safety management as the best method of conducting business and supports implementation of DOE Policy DOE P 450.4, "Safety Management Systems Policy." Safety, health, and protection of workers and the environment take precedence over expediency.

It is an SNJV policy to conduct radiological operations in a manner that ensures the health and safety of its employees, contractors, and the general public. In achieving this objective, SNJV shall ensure that radiation exposures to its workers and the public and releases of radioactivity to the environment are maintained below regulatory limits and deliberate efforts are taken to further reduce exposures and releases as low as reasonably achievable (ALARA). SNJV is fully committed to implementing a radiological control program of the highest quality to consistently reflect this policy.

The scope of NV ERP activities encompasses all phases of investigation and remediation of inactive radioactive and/or hazardous waste disposal or release sites under NNSA/NSO management. Activities range from site discovery and initial assessment, to site characterization and analysis of remedial action, periodic site monitoring, and regulatory closure. SNJV performs functions that include, but are not limited to, the following:

- Environmental restoration support
- Site assessments and characterizations
- Regulatory support
- Remedial actions
- Establishment and evaluation of corrective action levels for site remediation
- Data acquisition using existing and new technology
- Testing of newly developed technology for site characterization
- Testing new uses for existing technology
- Screening analysis of radiological samples for site characterization activities

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- Operation of radiation detection instrumentation for site characterization activities
- Geophysical well logging
- Operation of radiation-generating devices
- Use and transportation of radioactive material and radioactive sources
- Drilling and environmental technologies studies
- Radioactive waste characterization, storage, and disposal
- Radiological monitoring and worker protection services
- Decontamination and decommissioning

The Radiological Safety Prime Contractor (RSPC) is the organization responsible to NNSA/NSO for the coordination of the radiological safety aspects of NTS operations through the Management and Operating contract. The RSPC is responsible for providing radiological safety services to organizations operating at the NTS that meet requirements including, but not limited to, 10 CFR 835.203, 205, 209, 702, and 801. Dosimetry services are also provided by the RSPC. Training in accordance with the requirements in 10 CFR 835.901 is provided by the RSPC and/or SNJV. SNJV utilizes trained and qualified Radiological Control Technicians (RCTs) to implement radiological controls for work activities conducted in radiological areas. SNJV uses RSPC RCT support to ensure adequate coverage for radiological work conducted on the NTS and for work activities where RSPC personnel are required to work in radiological areas, as necessary. When RSPC radiological control support is utilized, the RSPC provides RCTs, radiological instrumentation, and the supplies necessary to implement radiological controls. Additionally, the RSPC documents the radiological monitoring results. The RCT support between the RSPC and SNJV is coordinated by the organization that is assigned radiological control responsibility for the work activity through the Real Estate/Operations Permit (REOP) process. For work conducted in radiological areas on and off the NTS not requiring RSPC personnel to work in radiological areas (e.g., SNJV and SNJV subcontractors), SNJV utilizes the radiological monitoring services of SNJV, the RSPC, or a qualified provider of radiological services, as necessary.

2.0 FACILITIES DESCRIPTION

SNJV is responsible for implementation of 10 CFR 835 requirements in accordance with this RPP for facilities held by SNJV under a Primary or Secondary REOP per NSO M 412.X-1D, "Real Estate/Operations Permit," as a component of safety coordination responsibility. As examples, SNJV performs work under a Primary REOP at the following facilities:

- Area 23, Building 153 is used for staging/use of radiological monitoring instrumentation, radioactive source storage/use, and preparation/assessment of samples.
- Area 6, Building 901 is used as a warehouse primarily for the Underground Test Area project. Generally samples and radioactive materials are not staged/used at this facility.

3.0 HAZARD IDENTIFICATION

A hazard analysis is performed prior to startup of radiological work. The analysis identifies potential hazards that may be encountered during site activities, and the results of the analysis are documented in site-specific health and safety plans used to develop appropriate protective measures.

Radionuclides of concern vary among work sites. Most of the environmental restoration sites on the NTS and Tonopah Test Range are older than 20 years. Radionuclides that may be present include, but are not limited to, aged fission products (cesium-137 and strontium-90), uranium, plutonium, and tritium.

4.0 ALARA COMMITMENT

It is the policy of SNJV and subcontractors to conduct research and operations in a manner to protect the health and safety of employees, visitors, and members of the public. SNJV is committed to reduce safety or health risks associated with radioactive materials and ionizing radiation to levels that are ALARA. To accomplish this:

- No activity or operation shall be conducted unless its performance will produce a net positive benefit.
- All radiation exposures shall be kept ALARA considering economic and societal costs.
- No individual shall receive radiation doses in excess of federal or administrative limits.

SNJV maintains its own ALARA Committee and is also a participating member of the NTS Contractors' Site-Wide ALARA Committee. The SNJV ALARA Program is implemented through company procedures that assign responsibilities and establish the methods for integrating ALARA principles into work activities.

5.0 SUMMARY

Various work activities are performed by SNJV at the direction of the NV ERP for NNSA/NSO. In its conduct of work, SNJV is committed to using integrated safety management as the best method of conducting business and conducting its radiological operations in a manner that ensures the health and safety of all its employees, contractors, the general public, and the environment. In achieving this objective, SNJV ensures that radiation exposures to its workers and the public and releases of radioactivity to the environment are maintained below regulatory limits, and ensures that every effort is taken to reduce exposures and releases to levels that are ALARA.

SNJV complies with the requirements of 10 CFR 835. SNJV will fully implement the recent revision to 10 CFR 835 by July 2010, as provided in Appendix H of this document.

6.0 IMPLEMENTATION SCHEDULE AND PLAN

SNJV is committed to completing the necessary changes to its radiological protection program procedures and practices to meet the 10 CFR 835 implementation deadline of July 9, 2010. SNJV management is committed to providing the resources required to revise the NV/YMP Radiological Control Manual (NV/YMP RCM) (Bechtel Nevada, 2004¹), Radiological Worker training, and SNJV implementing documentation (including procedures, technical work documents, and forms). SNJV implementing documentation flows down from the NV/YMP RCM and Radiological Worker training and is dependent upon certain services provided by the RSPC. Therefore, the specific changes to SNJV implementing documentation will be scheduled and completed consistent with the changes to these documents. In addition to changes to internal procedures and practices, SNJV will:

- Publish an internal implementation notice to inform SNJV associates of the changes within 10 CFR 835 to explain the impacts to internal documentation and processes and to describe the differences in terminology.
- Continue its contributions in the NV/YMP RCM revision until such time as the revision is approved.
- Update the SNJV Radiological Worker training material.

The changes implemented by SNJV will undergo a validation and verification process before publication and prior to the July 9, 2010, deadline.

During the implementation period established in the updated regulation, NTS will consider the terms defined in the updated regulation to be equivalent as follows:

Existing Term	Equivalent Term
Committed effective dose equivalent	Committed effective dose
Committed dose equivalent	Committed equivalent dose
Cumulative total effective dose equivalent	Cumulative total effective dose
Dose equivalent	Equivalent dose
Effective dose equivalent	Effective dose
Quality factor	Radiation weighting factor
Weighting factor	Tissue weighting factor
Total effective dose equivalent	Total effective dose

Deleted Terms (Not defined in ICRP 60 or ICRP 68)	Replacement Terms
Deep dose equivalent	Equivalent dose to the whole body
Shallow dose equivalent	Equivalent dose to the skin or to an extremity
Lens of the eye dose equivalent	Equivalent dose to the lens of the eye

¹ Bechtel Nevada was the previous RSPC responsible for the publishing of the NV/YMP RCM.

APPENDIX F DESERT RESEARCH INSTITUTE

1.0 SCOPE

This appendix pertains to activities conducted by the Desert Research Institute (DRI), a nonprofit research campus of the Nevada System of Higher Education, and its subcontractors at the Nevada Test Site (NTS), at other locations on behalf of the U.S. Department of Energy National Nuclear Security Administration Nevada Site Office (NNSA/NSO), and at the inactive Nevada Off-site Test Areas for the U.S. Department of Energy (DOE) Office of Legacy Management. It also applies to activities conducted by DRI for the Yucca Mountain Office of Repository Development. The radiological activities conducted by DRI personnel supporting the U.S. Department of Energy, National Nuclear Security Administration (NNSA) and non-NNSA projects at its facilities located in Las Vegas and Reno are not within the scope of this appendix, but are covered under the regulations stated in the Radioactive Material License issued to the University of Nevada, Reno (UNR) by the state of Nevada Radiological Health Section of the Department of Human Resources. In addition, DRI's use of radioactive materials or radioactive sealed sources on DOE sites similarly falls under the provision of the UNR's radioactive material license and their radiation safety program.

The DRI Environmental, Health and Safety (EH&S) Office and the Office of the Executive Vice President for Research are responsible for the assurance that DRI employees are provided radiological safety training applicable to their job duties and that they participate in the radiological safety program, as required, under the rules and provisions stated in the NV/YMP Radiological Control Manual (NV/YMP RCM) (Bechtel Nevada, 2004¹) and/or as required under the conditions stated in Radioactive Material License #16-13-0003-07 issued to UNR.

The definitions used in the NTS Radiation Protection Program (RPP) as defined in Title 10 Code of Federal Regulations (CFR) Part 835.2 and in the NV/YMP RCM are acceptable to DRI.

2.0 FACILITY DESCRIPTION

DRI works closely with the NNSA, other federal agencies, contractors, and National Weapons Laboratories on issues related to past and present testing at the NTS and other former testing locations, at Yucca Mountain, and at other locations on behalf of DOE. In addition, DRI conducts activities on the NTS on behalf of other agencies (e.g., National Science Foundation).

¹ Bechtel Nevada was the previous primary contractor responsible for the publishing of the NV/YMP RCM.

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Currently, DRI conducts a number of investigative programs compatible with its expertise, and within these programs, there are a number of activities applicable to the scope of this RPP. These programs include:

- Hydrologic Resource Management Program
- Environmental Restoration Project
- Waste Management Program
- Cultural Resources and Historical Preservation
- Containment Evaluation Program
- Test Control Panel and Test Readiness
- Nonproliferation and Emergency Management
- Inactive Off-site Test Areas
- Yucca Mountain
- Community Environmental Monitoring Program and other environmental monitoring off the NTS
- Technology and Energy Development and Testing

3.0 HAZARD IDENTIFICATION

On behalf of NNSA, DRI conducts a variety of investigative studies in security and radiological controlled areas at the NTS and the off-site locations. Many of the areas where DRI conducts field studies (including activities such as collecting of water, soil, air particulates, and cultural and historic materials) are areas that potentially have been contaminated with radioactive materials released from prior nuclear testing. Therefore, a potential occupational safety and health risk due to direct or indirect exposure to ionizing radiation exists.

DRI's RPP objectives are to establish and maintain a radiological protection program consistent with the scope of its activities at the NTS and to ensure that any radiological exposure is as low as reasonably achievable (ALARA). DRI is committed to conducting operations in a manner that not only protects the safety and health of our employees, but also minimizes damage or loss to government- and company-owned property, and protects the environment and the public. The ALARA objectives are met by:

- Working under site-specific health and safety plans (HASPs) that address radiological exposure (as well as other health and safety hazard) controls developed by the lead contractor for a project.

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- Writing and working to site-specific HASPs when DRI is the lead organization on a project.
- Preparing this RPP and accepting relevant sections of the NV/YMP RCM, which provide measures to assess and report exposures, provide training requirements, and provide record-keeping requirements. The NV/YMP RCM also provides DRI employees the assurance that every attempt has been made to define the appropriate approach to avoid a radiation exposure as well as to define the regulatory limitations and requirements to perform their work safely.
- Adopting the radiation safety policies and procedures outlined in UNR's Radiation Safety Manual.

Unless specifically addressed in subsequent sections, many of the radiological protective services required by 10 CFR 835 are provided by the Radiological Safety Prime Contractor (RSPC). It is the responsibility of the DRI EH&S Director/Radiological Control Manager to ensure that DRI employees comply with the conditions established by the RSPC for these services.

4.0 ALARA COMMITMENT

It is DRI's policy to conduct *all* operations and research in a manner protective of the health and safety of employees, visitors, and members of the public, as well as of property and the environment. As part of that policy, DRI follows sound radiological safety practices to ensure that potential safety and health risks associated with exposure to ionizing radiation are reduced to ALARA.

Elements of DRI's ALARA efforts include:

- The requirement for DRI employees to receive radiation safety training and education commensurate to the work conducted.
- The preparation of written procedures and protocols.
- The review of radiation safety protocols involving the NTS Contractors' Site-Wide ALARA Committee (SWAC), the Radiological Control Manager's Council, and/or the UNR Radiation Safety Committee (RSC), as appropriate.
- The maintenance of radiation safety records.

In planning an operation involving the use of radioactive material, the use of radioactive sealed sources, or activities involving the disturbance of radiological contaminated lands and waters, the following ALARA principles are to be addressed:

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- Eliminating, to the extent possible, the necessity of an exposure to radioactive material by the substitution of other technologies or materials
- Use of suitable containment, ventilation, and processing
- Eliminating or reducing the time spent in the vicinity of a radiation source
- Performing work activities in such a manner that the source potential of the radiation field is at maximal distance
- Use of shielding between the worker and the radiation source

DRI is also represented at the NTS Contractors' SWAC, the Radiological Control Manager's Council, and the UNR RSC meetings.

5.0 EXCLUSIONS

DRI's activities involving radioactive materials outside of NNSA/NSO projects and DRI's use of radioactive materials including sealed sources on NNSA/NSO projects fall under UNR's radioactive materials license number 16-13-0003-07 issued by the State of Nevada, and are therefore excluded (§835.1(b) (1)).

On occasion, DRI may conduct radioactive material transportation operations on the NTS that require the use of exclusion 10 CFR 835.1(b)(4). For offsite shipments (leaving the NTS) and for on-site transportation (within the boundaries of the NTS), DRI will adhere to U.S. Department of Transportation requirements. Shipping papers for either scenario are prepared for DRI personnel by the UNR Radiation Safety Office.

6.0 IMPLEMENTATION PLAN AND SCHEDULE

DRI is in compliance with applicable sections of 10 CFR 835 (dated November 4, 1998) and the UNR Radioactive Materials License. 10 CFR 835 was updated on June 8, 2007. As a result, DRI is not fully in compliance with the following requirements of the updated 10 CFR 835 as applicable to DRI (see Appendix H for areas of applicability): 10 CFR 835.1, 10 CFR 835.2, 10 CFR 835.4, 10 CFR 835.101, 202, 203, 205, 206, 401, 402, 405, 502, 602, 606, 702, 1001, 1003, 1202, 1301, Appendix A, Appendix C, Appendix D, and Appendix E. Since DRI utilizes the RSPC for radiological services for activities conducted on the NTS, compliance depends on the RSPC schedule for implementation as described in Appendix A of this RPP. Program modifications will be developed as needed, and the NV/YMP RCM and/or other performance documents will be revised and provided to NNSA/NSO to demonstrate compliance with these requirements by July 2010.

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During the implementation period established in the updated regulation, NTS will consider the terms defined in the updated regulation to be equivalent as follows:

Existing Term	Equivalent Term
Committed effective dose equivalent	Committed effective dose
Committed dose equivalent	Committed equivalent dose
Cumulative total effective dose equivalent	Cumulative total effective dose
Dose equivalent	Equivalent dose
Effective dose equivalent	Effective dose
Quality factor	Radiation weighting factor
Weighting factor	Tissue weighting factor
Total effective dose equivalent	Total effective dose

Deleted Terms(Not defined in ICRP 60 or ICRP 68)	Replacement Terms
Deep dose equivalent	Equivalent dose to the whole body
Shallow dose equivalent	Equivalent dose to the skin or to an extremity
Lens of the eye dose equivalent	Equivalent dose to the lens of the eye

7.0 SUMMARY

DRI is in compliance with applicable sections of 10 CFR 835 (dated November 4, 1998) and the UNR Radioactive Materials License. 10 CFR 835 was revised on June 8, 2007. DRI will demonstrate full compliance with the June 2007 update of 10 CFR 835 by July 2010.

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APPENDIX G

WACKENHUT SERVICES, INCORPORATED

1.0 SCOPE

Wackenhut Services, Incorporated/Nevada Operations (WSI/NV) is a subsidiary of the Wackenhut Corporation, a worldwide security and investigation corporation. WSI/NV provides security services to the U.S. Department of Energy (DOE) at the Nevada Test Site (NTS) and DOE-affiliated operations within Las Vegas, Nevada. WSI/NV provides security support operations through a variety of interagency agreements relative to underground tests, emergencies, and other related functional operations.

It is the policy of WSI/NV to conduct its radiological operations in a manner that ensures the health and safety of all its employees, contractors, and the general public. In achieving this objective, WSI/NV shall ensure that radiation exposures to its workers and the public and releases of radioactivity to the environment are maintained below regulatory limits and deliberate efforts are taken to further reduce exposures and releases as low as reasonably achievable (ALARA). WSI/NV is fully committed to implementing a radiological control program of the highest quality that consistently reflects this policy. Additionally, WSI/NV is committed to using integrated safety management as the best method of conducting business and supports implementation of DOE Policy DOE P 450.4, "Safety Management Systems Policy."

WSI/NV has approved the NV/YMP Radiological Control Manual (NV/YMP RCM) (Bechtel Nevada, 2004¹) and has implemented the articles that are applicable to WSI/NV operations. When WSI/NV performs work for other contractors, WSI/NV abides by the safety and radiological requirements established and implemented by the other contractor.

2.0 ACTIVITIES

WSI/NV conducts the following activities that are not delineated in the NV/YMP RCM.

- Radiological Emergencies

Description: When employed, WSI/NV will provide on-site security support for the Nuclear Emergency Search Team, Accident Response Group, and Federal Radiological Monitoring and Assessment Center.

- Access Control, Device Assembly Facility (DAF)

Description: WSI/NV employees will operate the X-ray system as part of the access control plans for the DAF. The X-ray source is permanently mounted inside of a lead-lined cabinet, eliminating the potential for exposure except for when an access panel or door is opened.

¹ Bechtel Nevada was the previous prime contractor responsible for the publishing of the NV/YMP RCM.

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- Portal Monitor Testing, DAF

Description: WSI/NV Protective Force (Radiological Worker I or Radiological Worker II trained) are required to test special nuclear material detectors in the course of their normal duties using sealed radioactive sources.

- DAF Gas Defense System Project

Description: The Technical and Information Services Division, Electronic Systems Technicians (Radiological Worker I trained) are required to perform operational checks, preventive and corrective maintenance, periodic modifications, and system upgrades of the gas defense system. Work will be performed in a Radioactive Material Area, if required.

3.0 ALARA COMMITMENT

WSI/NV is fully committed to keeping radiation exposures to WSI personnel ALARA. It is the policy of WSI that employees practice ALARA principles in the conduct of day-to-day operations and adhere to the provisions of Title 10 Code of Federal Regulations (CFR) Part 835, "Occupational Radiation Protection," as defined by Appendix H of the NTS Radiation Protection Program. Radiological safety training is the primary mechanism by which the concept of maintaining personnel radiation dose equivalents ALARA is passed on to the individual. WSI/NV Environment, Safety, and Health (ES&H) personnel monitor measurements of occupational radiation dose to verify and document that doses are being maintained ALARA.

The WSI/NV ALARA program is implemented through company procedure. This procedure assigns responsibilities and establishes the methods for integrating ALARA principles into work activities. The WSI/NV ES&H personnel review all plans for operations that may require WSI/NV personnel to be exposed to ionizing radiation.

The potential for exposure of WSI/NV personnel to ionizing radiation is extremely low. WSI ES&H personnel participate in the NTS Contractors' Site-Wide ALARA Committee (SWAC) to affect their NTS ALARA program. Any WSI activity that has the potential to exceed NTS administrative limits shall be reviewed by SWAC before being instituted. The minutes of these meetings constitute the record of the WSI/NV ALARA program elements.

4.0 IMPLEMENTATION PLAN

WSI is in compliance with applicable sections of 10 CFR 835 (dated November 4, 1998). 10 CFR 835 was updated on June 8, 2007. As a result, WSI is not fully in compliance with the following requirements of the updated 10 CFR 835 as applicable to WSI (see Appendix H for areas of applicability): 10 CFR 835.1, 10 CFR 835.2, 10 CFR 835.4, 10 CFR 835.101, 202, 203, 205, 206, 401, 402, 405, 502, 602, 606, 702, 1001, 1003, 1202, 1301, Appendix A, Appendix C, Appendix D, and Appendix E. Since WSI utilizes the Radiation Safety Prime Contractor (RSPC) for radiological services for activities conducted on the NTS, compliance depends on the RSPC schedule for implementation as described in Appendix A of this RPP. Program modifications will be developed as needed, and the NV/YMP RCM and/or other performance documents will

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be revised and provided to the U.S. Department of Energy, National Nuclear Security Administration Nevada Site Office to demonstrate compliance with these requirements by July 2010.

During the implementation period established in the updated regulation, NTS will consider the terms defined in the updated regulation to be equivalent as follows:

Existing Term	Equivalent Term
Committed effective dose equivalent	Committed effective dose
Committed dose equivalent	Committed equivalent dose
Cumulative total effective dose equivalent	Cumulative total effective dose
Dose equivalent	Equivalent dose
Effective dose equivalent	Effective dose
Quality factor	Radiation weighting factor
Weighting factor	Tissue weighting factor
Total effective dose equivalent	Total effective dose

Deleted Terms (Not defined in ICRP 60 or ICRP 68)	Replacement Terms
Deep dose equivalent	Equivalent dose to the whole body
Shallow dose equivalent	Equivalent dose to the skin or to an extremity
Lens of the eye dose equivalent	Equivalent dose to the lens of the eye

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NEVADA TEST SITE RADIATION PROTECTION PROGRAM

APPENDIX H COMPLIANCE DEMONSTRATION TABLE

Title 10 Code of Federal Regulations (CFR) Part 835	NV/YMP Radiological Control Manual (NV/YMP RCM), Revision 5 and Nevada Test Site Radiation Protection Program (NTS RPP), Revision 0	NATIONAL SECURITY TECHNOLOGIES (NSTec) Appendix A	LAWRENCE LIVERMORE NATIONAL LABORATORY (LLNL) Appendix B	LOS ALAMOS NATIONAL LABORATORY (LANL) Appendix C	SANDIA NATIONAL LABORATORIES (SNL) Appendix D	STOLLER-NAVARRO JOINT VENTURE (SNJV) Appendix E	DESERT RESEARCH INSTITUTE (DRI) Appendix F	WACKENHUT SERVICES (WSI) Appendix G
	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference

Appendix H is divided into nine columns containing the following information:

- Column 1 lists the “10 CFR 835 Requirements.” In order to address each requirement, as required by 10 CFR 835.101(e), it is necessary that the RPP re-state the requirement.
- Column 2 lists the RCM Rev 5 and RPP Rev 0 implementation language.
- Column 3 identifies the articles to be revised in the next RCM revision and lists the NSTec RPP implementation references.
- Columns 4-9 identify the implementation references for each additional Tenant Organization (TO). The additional TOs adopt the implementation references as given in column 3; any variances to these implementation references are so noted.

References to the site-specific NV/YMP RCM are coded according to the following scheme: “NV/YMP RCM 112.1.01.” This is interpreted as referring to the current NV/YMP RCM, with “112” corresponding to the article number, “.1” being the appropriate subparagraph, and “.01” pointing to the first sentence within the referenced subparagraph.

Subpart A-General Provisions 835.1 Scope. 835.1(a) General. The rules in this part establish radiation protection standards, limits, and program requirements for protecting individuals from ionizing radiation resulting from the conduct of DOE activities.	NTS RPP Narrative Sections: 1.0 Purpose, 2.0 Commitment, and 3.0 Scope	NTS RPP Narrative Sections: 1.0 Purpose, 2.0 Commitment, and 3.0 Scope	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3
835.1(b) Exclusion. Except as provided in	NTS RPP Narrative	NTS RPP Narrative	Same as Column 3 and LLNL	Same as Column 3 and LANL	Same as Column 3 and SNL	Same as Column 3	Same as Column 3 and DRI	Same as Column 3

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<p>paragraph (c) of this section, the requirements in this part do not apply to:</p> <p>(1) Activities that are regulated through a license by the Nuclear Regulatory Commission or a State under an Agreement with the Nuclear Regulatory Commission, including activities certified by the Nuclear Regulatory Commission under section 1701 of the Atomic Energy Act;</p> <p>(2) Activities conducted under the authority of the Deputy Administrator for Naval Reactors, as described in Pub. L. 98-525 and 106-65;</p> <p>(3) Activities conducted under the Nuclear Explosive and Weapons Surety Program relating to the prevention of accidental or</p>	Section: 3.0 Scope	Section: 3.0 Scope	Appendix B, Narrative Section 5.0 Exclusions	Appendix C, Narrative Section: 5.0 Exclusions	Appendix D, Narrative Section 5.0 Exclusions		Appendix F, Narrative Section 5.0 Exclusions	
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unauthorized nuclear detonations; (4) DOE activities conducted outside the United States on territory under the jurisdiction of a foreign government to the extent governed by occupational radiation protection requirements agreed to between the United States and the cognizant government. (5) Background radiation, radiation doses received as a patient for the purposes of medical diagnosis or therapy, or radiation doses received from voluntary participation as a subject in medical research programs; or (6) Radioactive material on or within material, equipment, and real property which is approved for								

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release when the radiological conditions of the material, equipment, and real property have been documented to comply with the criteria for release set forth in a DOE authorized limit which has been approved by a Secretarial Officer in consultation with the Chief Health, Safety and Security Officer. (7) Radioactive material transportation not performed by DOE or a DOE contractor.								
835.1(c) Occupational doses received as a result of excluded activities and radioactive material transportation, listed in paragraphs (b)(1) through (b)(4) and (b)(7) of this section, shall be included to the extent practicable when determining compliance with the	NTS RPP Narrative Section: 3.0 Scope	NTS RPP Narrative Section: 3.0 Scope	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3

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occupational dose limits at §§ 835.202 and 835.207, and with the limits for the embryo/fetus at § 835.206. Occupational doses resulting from authorized emergency exposures and planned special exposures shall not be considered when determining compliance with the dose limits at §§ 835.202 and 835.207.								
835.1(d) The requirements in subparts F and G of this part do not apply to radioactive material transportation by DOE or a DOE contractor conducted: (1) Under the continuous observation and control of an individual who is knowledgeable of and implements required exposure control measures, or	N/A	NTS RPP Narrative Section: 3.0 Scope	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3

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(2) In accordance with Department of Transportation regulations or DOE orders that govern such movements.								
835.2 Definitions.	NV/YMP RCM, Glossary	Revise: NV/YMP RCM, Glossary	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3
835.3 General rule. 835.3(a) No person or DOE personnel shall take or cause to be taken any action inconsistent with the requirements of: (1) This part; or (2) Any program, plan, schedule, or other process established by this part.	NTS RPP Narrative Section: 6.0 Responsibilities.	NTS RPP Narrative Section: 6.0 Responsibilities.	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3
835.3(b) With respect to a particular DOE activity, contractor management shall be responsible for compliance with the requirements of this part.	NTS RPP Narrative Section: 6.0 Responsibilities.	NTS RPP Narrative Section: 6.0 Responsibilities.	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3
835.3(c) Where there is no contractor for a DOE activity, DOE	NTS RPP Narrative Section:	NTS RPP Narrative Section:	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3

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shall ensure implementation of and compliance with the requirements of this part.	6.0 Responsibilities.	6.0 Responsibilities.						
835.3(d) Nothing in this part shall be construed as limiting actions that may be necessary to protect health and safety.	NTS RPP Narrative Section: 6.0 Responsibilities.	NTS RPP Narrative Section: 6.0 Responsibilities.	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3
835.3(e) For those activities that are required by §§835.102, 835.901(e), 835.1202(a), and 835.1202(b), the time interval to conduct these activities may be extended by a period not to exceed 30 days to accommodate scheduling needs.	NV/YMP RCM 134.02. The TO RadCon Manager may extend the time interval by a period not to exceed 30 days. NV/YMP RCM 613.3.b. The 24-month period may be extended by the TO RadCon Manager, not to exceed 30 days, to meet scheduling needs.	NV/YMP RCM 134.02. The TO RadCon Manager may extend the time interval by a period not to exceed 30 days. NV/YMP RCM 613.3.b. The 24-month period may be extended by the TO RadCon Manager, not to exceed 30 days, to meet scheduling needs.	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3

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	NV/YMP RCM, 431.2.f. The requirements for inventory and leak testing of accountable sealed sources are: f. The TO RadCon Manager may extend the time interval in Article 431.2.a by a period not to exceed 30 days.	NV/YMP RCM, 431.2.f. The requirements for inventory and leak testing of accountable sealed sources are: f. The TO RadCon Manager may extend the time interval in Article 431.2.a by a period not to exceed 30 days.						
835.4 Radiological units. Unless otherwise specified, the quantities used in the records required by this part shall be clearly indicated in special units of curie, rad, roentgen, or rem, including multiples and subdivisions of these units, or other conventional units, such as, dpm,	NV/YMP RCM 713.2.c. Radiological control records shall not include: c. The use of Systems International (SI) units (such as Bq, Gy, and Sv).	Remove: NV/YMP RCM 713.2.c. and 713.2.d. Revise: NV/YMP RCM 713.3 - The quantities used in the records required by this part shall be clearly indicated in special units of curie, rad, roentgen, or rem,	Same as Column 3	Same as Column 3	Radiological control records for SNL activities at NTS are prepared and maintained by the Radiation Safety Prime Contractor (RSPC).	Same as Column 3	Not a DRI activity. Records containing radiological units are generated for DRI by the RSPC (or University of Nevada, Reno, [UNR] Radiation Safety Office for excluded activities).	Not a WSI/NV activity. Radiological control records for WSI are prepared and maintained by the RSPC or TO that has radiological control responsibilities for an activity. Records containing radiological units

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dpm/100 cm ² or mass units. The SI units, Becquerel (Bq), gray (Gy), and sievert (Sv), may be provided parenthetically for reference with scientific standards.		including multiples and subdivisions of these units, or other conventional units, such as, dpm, dpm/100 cm ² or mass units. The SI units, becquerel (Bq), gray (Gy), and sievert (Sv), may be provided parenthetically for reference with scientific standards.						under the RPP are generated by the RSPC.
Subpart B - Management and Administrative Requirements 835.101 Radiation protection programs. 101(a) A DOE activity shall be conducted in compliance with a documented radiation protection program (RPP) as approved by the DOE.	NV/YMP RCM 112.1.02. Any DOE activity as defined in 10 CFR 835 shall be planned and conducted in compliance with a documented RPP as approved by NNSA.	NV/YMP RCM 112.1.02. Any DOE activity as defined in 10 CFR 835 shall be planned and conducted in compliance with a documented RPP as approved by NNSA.	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3

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101(b) The DOE may direct or make modifications to a RPP.	NV/YMP RCM 157.5. The NNSA/NSO or YMORD, as appropriate, may direct modifications to an RPP.	Revise: NV/YMP RCM 157.5. The NNSA/NSO may direct modifications to an RPP.	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3
101(c) 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 exposure.	NV/YMP RCM 157.2.d. The content of each RPP shall: d. Be commensurate with the nature of the activities performed and shall include formal plans and measures for applying the ALARA process to occupational exposure. NSTec Appendix A, Narrative Section 4.0 ALARA Commitment.	NV/YMP RCM 157.2.d. The content of each RPP shall: d. Be commensurate with the nature of the activities performed and shall include formal plans and measures for applying the ALARA process to occupational exposure. RPP Narrative Section 7.0 ALARA Program.	Same as Column 3 and LLNL Appendix B, Section 4.0 ALARA Commitments	Same as Column 3 and LANL Appendix C, Section 4.0 ALARA Commitment	Same as Column 3 and SNL Appendix D Narrative Section 4.0 ALARA Commitment.	Same as Column 3 and SNJV Appendix E Narrative Sections: 1.0 Scope, 4.0 ALARA Commitment.	Same as Column 3 and DRI Appendix F, Narrative Section 3.0 Hazard Identification and 4.0 ALARA Commitment.	Same as Column 3 and WSI/NV Appendix G Narrative Section 1.0 Scope and Section 3.0 ALARA Commitment.
101(d) The RPP shall specify the existing and/or anticipated	NV/YMP RCM 157.2.c. The content of each	NV/YMP RCM 157.2.c. The content of each	Same as Column 3	Same as Column 3	Same as Column 3 and See SNL Appendix D,	Same as Column 3	Same as Column 3 and See DRI Appendix F,	Same as Column 3 and See WSI/NV

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	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference
operational tasks that are intended to be within the scope of the RPP. Except as provided in §835.101(h), any task outside the scope of a RPP shall not be initiated until an update of the RPP is approved by DOE.	<p>RPP shall: c. Specify the existing and/or anticipated operational tasks that are intended to be within the scope of the RPP.</p> <p>NV/YMP RCM 157.3.b. An update of the RPP shall be submitted to NNSA/NSO or YMORD: b. Before the initiation of a task not within the scope of the RPP. Except as provided in Article 157.3.a.1, any task outside the scope of an RPP shall not be initiated until an update of the RPP is approved by NNSA/NSO or YMORD, as appropriate.</p>	<p>RPP shall: c. Specify the existing and/or anticipated operational tasks that are intended to be within the scope of the RPP.</p> <p>Revise: NV/YMP RCM 157.3.b. An update of the RPP shall be submitted to NNSA/NSO: b. Before the initiation of a task not within the scope of the RPP. Except as provided in Article 157.3.a.1, any task outside the scope of an RPP shall not be initiated until an update of the RPP is approved by NNSA/NSO.</p>			Narrative Section 1.0 Scope.		Narrative Section 1.0 Scope.	Appendix G Narrative Section 1.0 Scope and Section 2.0 Activities.

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101(e) The content of the RPP shall address, but shall not necessarily be limited to, each requirement in this part.	NV/YMP RCM 157.2.a. The content of each RPP shall: a. Address, but shall not necessarily be limited to, each requirement in 10 CFR 835.	NV/YMP RCM 157.2.a. The content of each RPP shall: a. Address, but shall not necessarily be limited to, each requirement in 10 CFR 835.	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3
101(f) The RPP shall include plans, schedules, and other measures for achieving compliance with regulations of this part. Unless otherwise specified in this part, compliance with the amendments to this part, published on June 8, 2007 shall be achieved no later than July 9, 2010.	NV/YMP RCM 157.2.b. The content of each RPP shall: b. Include plans, schedules, and other measures for achieving compliance with the regulations within 10 CFR 835. NV/YMP RCM 157.4. An initial RPP or an update shall be considered approved 180 days after its submission unless rejected by NNSA/NSO or	Revise: NV/YMP RCM 157.2.b. The content of each RPP shall: b. Include plans, schedules, and other measures for achieving compliance with the amendments to this part published on June 8, 2007, no later than July 9, 2010.	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3

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	YMORD, as appropriate, at an earlier date.							
101(g) An update of the RPP shall be submitted to DOE: (1) Whenever a change or an addition to the RPP is made; (2) Prior to the initiation of a task not within the scope of the RPP; or (3) Within 180 days of the effective date of any modifications to this part.	NV/YMP RCM 157.3.a-c. An update of the RPP shall be submitted to NNSA/NSO or YMORD: a. Whenever a change or addition to the RPP is made and b. Before the initiation of a task not within the scope of the RPP. c. Within 180 days of the effective date of any modification to 10 CFR 835.	Revise: NV/YMP RCM 157.3.a-c. An update of the RPP shall be submitted to NNSA/NSO: a. Whenever a change or addition to the RPP is made. b. Before the initiation of a task not within the scope of the RPP. c. Within 180 days of the effective date of any modification to 10 CFR 835.	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3
101(h) Changes, additions, or updates to the RPP may become effective without prior Department approval only if the changes do not decrease the	NV/YMP RCM, 157.3.a. An update of the RPP shall be submitted to NNSA/NSO or YMORD: a. Whenever a	Revise: NV/YMP RCM, 157.3.a. An update of the RPP shall be submitted to NNSA/NSO: a. Whenever a change or	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3

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effectiveness of the RPP and the RPP, as changed, continues to meet the requirements of this part. Proposed changes that decrease the effectiveness of the RPP shall not be implemented without submittal to and approval by the Department.	change or addition to the RPP is made. (1) Changes, additions, or updates to the RPP may become effective without prior approval of NNSA/NSO or YMORD, as appropriate, only if the changes do not decrease the effectiveness of the RPP and the RPP, as changed, continues to meet the requirements of 10 CFR 835. (2) Proposed changes that decrease the effectiveness of the RPP shall not be implemented without submittal to and subsequent approval by	addition to the RPP is made. (1) Changes, additions, or updates to the RPP may become effective without prior approval of NNSA/NSO only if the changes do not decrease the effectiveness of the RPP and the RPP, as changed, continues to meet the requirements of 10 CFR 835. (2) Proposed changes that decrease the effectiveness of the RPP shall not be implemented without submittal to and subsequent approval by NNSA/NSO.						

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	NNSA/NSO or YMORD, as appropriate.							
101(i) An initial RPP or an update shall be considered approved 180 days after its submission unless rejected by DOE at an earlier date.	NV/YMP RCM 157.4. An initial RPP or an update shall be considered approved 180 days after its submission unless rejected by NNSA/NSO or YMORD, as appropriate, at an earlier date.	Revise: NV/YMP RCM 157.4. An initial RPP or an update shall be considered approved 180 days after its submission unless rejected by NNSA/NSO at an earlier date.	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3
835.102 Internal audits. Internal audits of the radiation protection program, including examination of program content and implementation, shall be conducted through a process that ensures that all functional elements are reviewed no less frequently than every 36 months.	NV/YMP RCM 134.01. Internal audits of the radiological control program shall be conducted such that over a 36-month period, all functional elements of 10 CFR 835 are assessed for program performance, applicability, content, and	NV/YMP RCM 134.01. Internal audits of the radiological control program shall be conducted such that over a 36-month period, all functional elements of 10 CFR 835 are assessed for program performance, applicability, content, and	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3

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	implementation.	implementation.						
835.103 Education, training and skills. Individuals responsible for developing and implementing measures necessary for ensuring compliance with the requirements of this part shall have the appropriate education, training, and skills to discharge these responsibilities..	NV/YMP RCM 142.3. Individuals responsible for developing and implementing measures necessary for ensuring compliance with the requirements of 10 CFR 835 shall have the appropriate education, training, and skills to discharge these responsibilities.	NV/YMP RCM 142.3. Individuals responsible for developing and implementing measures necessary for ensuring compliance with the requirements of 10 CFR 835 shall have the appropriate education, training, and skills to discharge these responsibilities.	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3
835.104 Written procedures. Written procedures shall be developed and implemented as necessary to ensure compliance with this part, commensurate with the radiological hazards created by the activity and consistent with the education, training, and skills of	NV/YMP RCM 113.4. Written procedures shall be developed and implemented as necessary to ensure compliance with 10 CFR 835.	NV/YMP RCM 113.4. Written procedures shall be developed and implemented as necessary to ensure compliance with 10 CFR 835.	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3

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the individuals exposed to those hazards.								
Subpart C - Standards for Internal and External Exposure 835.201 [Reserved]								
835.202 Occupational Dose Limits for General Employees. 202(a) Except for planned special exposures conducted consistent with §835.204 and emergency exposures authorized in accordance with §835.1302, the occupational dose received by general employees shall be controlled such that the following limits are not exceeded in a year: (1) A total effective dose of 5 rems (0.05 Sv); (2) The sum of the	NV/YMP RCM 213.1.a-d. Except for emergency exposures authorized according to 10 CFR 835.1302, the occupational dose received by general employees shall be controlled such that the following limits are not exceeded in a year. a. A total effective dose equivalent (TEDE) of 5 rem (0.05 sievert). b. The sum of	Revise: NV/YMP RCM 213.1 a-d. Except for planned special exposures conducted consistent with §835.204 and emergency exposures authorized in accordance with §835.1302, the occupational dose received by general employees shall be controlled such that the following limits are not exceeded in a year: (a) A total effective dose (TED) of 5 rems	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	DRI has adopted the UNR Radiation Safety Manual (RSM). Reference UNR RSM Policy III: Occupational Dose Limits and Contamination Standards.	Same as Column 3

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<p>equivalent dose to the whole body for external exposures and the committed equivalent dose to any organ or tissue other than the skin or the lens of the eye of 50 rems (0.5 Sv);</p> <p>(3) An equivalent dose to the lens of the eye of 15 rems (0.15 Sv); and</p> <p>(4) The sum of the equivalent dose to the skin or to any extremity for external exposures and the committed equivalent dose to the skin or to any extremity of 50 rems (0.5 Sv).</p>	<p>the deep dose equivalent for external exposures and the committed dose equivalent to any organ or tissue other than the lens of the eye of 50 rem (0.5 sievert).</p> <p>c. A lens of the eye dose equivalent of 15 rem (0.15 sievert).</p> <p>d. A shallow dose equivalent of 50 rem (0.5 sievert) to the skin or to any extremity.</p> <p>NV/YMP RCM 213.3. Planned special exposures are beyond the scope of operations conducted by NNSA/NSO or YMORD.</p>	<p>(0.05 Sv);</p> <p>(b) The sum of the equivalent dose to the whole body for external exposures and the committed equivalent dose to any organ or tissue other than the skin or the lens of the eye of 50 rems (0.5 Sv);</p> <p>(c) An equivalent dose to the lens of the eye of 15 rems (0.15 Sv); and</p> <p>(d) The sum of the equivalent dose to the skin or to any extremity for external exposures and the committed equivalent dose to the skin or to any extremity of 50 rems (0.5 Sv).</p>						

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202(b) All occupational doses received during the current year, except doses resulting from planned special exposures conducted in compliance with §835.204 and emergency exposures authorized in accordance with §835.1302, shall be included when demonstrating compliance with §§835.202(a) and 835.207.	NV/YMP RCM 213.1.03 and .04. The TEDE during a year shall be determined by summing the effective dose equivalent from external exposures and the committed effective dose equivalent (CEDE) from intakes during the year, and shall be used when demonstrating compliance with Table 2-1 dose limits. All occupational doses received during the current year except emergency exposures authorized according to 10 CFR	Revise: NV/YMP RCM 213.1.03 and .04. The TED during a year shall be determined by summing the effective dose from external exposures and the committed effective dose (CED) from intakes during the year and shall be used when demonstrating compliance with Table 2-1 dose limits. All occupational doses received during the current year except emergency exposures authorized according to 10 CFR 835.1302 shall be included.	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	Written dose assessments for DRI personnel are determined by the RSPC.	By written agreement, dose assessments are determined by the RSPC for WSI/NV.

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	835.1302 shall be included. NV/YMP RCM 213.3. Planned special exposures are beyond the scope of operations conducted by NNSA/NSO or YMORD.	Revise: NV/YMP RCM 213.3. Planned special exposures are beyond the scope of operations conducted by NNSA/NSO or OCRWM.						
202(c) Doses from background, therapeutic and diagnostic medical radiation, and participation as a subject in medical research programs shall not be included in dose records or in the assessment of compliance with the occupational dose limits.	NV/YMP RCM Table 2-1 Notes: 3. Doses from background, therapeutic and diagnostic medical radiation, and participation as a subject in medical research programs shall not be included in dose records or in the assessment of compliance with the occupational dose limits.	NV/YMP RCM Table 2-1 Notes: 3. Doses from background, therapeutic and diagnostic medical radiation, and participation as a subject in medical research programs shall not be included in dose records or in the assessment of compliance with the occupational dose limits.	Same as Column 3	This is outside the scope of the LANL/NTS Radiological Control Program. The NTS RSPC and, by written agreement, the LANL RP-2 Dose Assessment Team perform the dose assessments for LANL/NTS. The LANL RP-2 Radiation Information Management Team records and maintains	Same as Column 3	Same as Column 3	Same as Column 3. Regarding dually badged employees, UNR subtracts background via subtraction of dose recorded on a control badge.	Same as Column 3

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	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference
				LANL employee dose assessments provided by the NTS RSPC.				
835.203 Combining internal and external dose equivalents. 203(a) The total effective dose during a year shall be determined by summing the effective dose from external exposures and the committed effective dose from intakes during the year.	NV/YMP RCM 213.1.03. The TEDE during a year shall be determined by summing the effective dose equivalent from external exposures and the CEDE from intakes during the year and shall be used when demonstrating compliance with Table 2-1 dose limits.	Revise: NV/YMP RCM 213.1.03. The TED during a year shall be determined by summing the effective dose from external exposures and the CED from intakes during the year and shall be used when demonstrating compliance with Table 2-1 dose limits.	Dosimetry services are provided to LLNL by the RSPC per NV/YMP RCM 141.3.e.	This is outside the scope of the LANL/NTS Radiological Control Program. The NTS RSPC and, by written agreement, the LANL RP-2 Dose Assessment Team perform the dose assessments for LANL/NTS. The LANL RP-2 Radiation Information Management Team records and maintains LANL employee dose assessments provided by the NTS RSPC.	Same as Column 3	NV/YMP RCM 141.3.e. The RSPC shall provide the following: e. External and internal dosimetry services.	Not applicable to DRI. Dosimetry services, including the calculation of TED, are provided to DRI by the RSPC per NV/YMP RCM 141.3.e.	By written agreement, dosimetry services are provided to WSI/NV by the RSPC per NV/YMP RCM 141.3.e.
203(b) Determinations of the effective dose	NV/YMP RCM Appendix 2B.	Remove NV/YMP RCM	Dosimetry services are	This is outside the scope of the	Same as Column 3	NV/YMP RCM 141.3.e. The	Dosimetry services are	By written agreement,

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shall be made using the radiation and tissue weighting factor values provided in § 835.2.	Table 2B-1, Weighting Factors for Organs and Tissues	Appendix 2B. Add: NV/YMP RCM 213.1.06 Determinations of the effective dose shall be made using the radiation and tissue weighting factors provided in 10 CFR 835.2, "Radiation Weighting Factors."	provided to LLNL by the RSPC per NV/YMP RCM 141.3.e.	LANL/NTS Radiological Control Program. The NTS RSPC and, by written agreement, the LANL RP-2 Dose Assessment Team perform the dose assessments for LANL/NTS. The LANL RP-2 Radiation Information Management Team records and maintains LANL employee dose assessments provided by the NTS RSPC.		RSPC shall provide the following: e. External and internal dosimetry services.	provided to DRI by the RSPC per NV/YMP RCM 141.3.e.	dosimetry services are provided to WSI/NV by the RSPC per NV/YMP RCM 141.3.e.
835.204 Planned Special Exposures. 204(a) A planned special exposure may be authorized for a radiological worker to receive doses in addition to and accounted for	NV/YMP RCM 213.3. Planned special exposures are beyond the scope of operations conducted by NNSA/NSO or YMORD.	Revise: NV/YMP RCM 213.3. Planned special exposures are beyond the scope of operations conducted by NNSA/NSO or OCRWM.	Planned special exposures are beyond the scope of operations conducted by LLNL at the NTS. LLNL will not conduct a planned special	This is outside the scope of the LANL/NTS Radiological Control Program. Planned special exposures are beyond the scope of operations	Same as Column 3	Same as Column 3	The contents of this section are not applicable to DRI as there are no circumstances for planned special exposures to employees	The contents of this section are not applicable to WSI/NV as there are no circumstances for planned special exposures to employees.

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separately from the doses received under the limits specified in §835.202(a), provided that each of the following conditions is satisfied: (1) The planned special exposure is considered only in an exceptional situation when alternatives that might prevent a radiological worker from exceeding the limits in §835.202(a) are unavailable or impractical; (2) The contractor management (and employer, if the employer is not the contractor) specifically requests the planned special exposure, in writing; and (3) Joint written approval is received from the appropriate DOE Headquarters program office and the Secretarial Officer responsible for			exposure at the NTS.	conducted by LANL at the NTS. LANL will not conduct a planned special exposure at the NTS.				

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	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference

environment, safety and health matters.								
204(b) Prior to requesting an individual to participate in an authorized planned special exposure, the individual's dose from all previous planned special exposures and all doses in excess of the occupational dose limits shall be determined.	NV/YMP RCM 213.3. Planned special exposures are beyond the scope of operations conducted by NNSA/NSO or YMORD.	Revise: NV/YMP RCM 213.3. Planned special exposures are beyond the scope of operations conducted by NNSA/NSO or OCRWM.	Planned special exposures are beyond the scope of operations conducted by LLNL at the NTS. LLNL will not conduct a planned special exposure at the NTS.	This is outside the scope of the LANL/NTS Radiological Control Program. Planned special exposures are beyond the scope of operations conducted by LANL at the NTS. LANL will not conduct a planned special exposure at the NTS.	Same as Column 3	Same as Column 3	The contents of this section are not applicable to DRI as there are no circumstances for planned special exposures to employees.	The contents of this section are not applicable to WSI/NV as there are no circumstances for planned special exposures to employees.
204(c) An individual shall not receive a planned special exposure that, in addition to the doses determined in §835.204(b), would result in a dose exceeding the following: (1) In a year, the numerical values of the dose limits established at	NV/YMP RCM 213.3. Planned special exposures are beyond the scope of operations conducted by NNSA/NSO or YMORD.	Revise: NV/YMP RCM 213.3. Planned special exposures are beyond the scope of operations conducted by NNSA/NSO or OCRWM.	Planned special exposures are beyond the scope of operations conducted by LLNL at the NTS. LLNL will not conduct a planned special exposure at the NTS.	This is outside the scope of the LANL/NTS Radiological Control Program. Planned special exposures are beyond the scope of operations conducted by LANL at the NTS. LANL will not conduct a	Same as Column 3	Same as Column 3	The contents of this section are not applicable to DRI as there are no circumstances for planned special exposures to employees.	The contents of this section are not applicable to WSI/NV as there are no circumstances for planned special exposures to employees.

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§835.202(a); and (2) Over the individual's lifetime, five times the numerical values of the dose limits established at §835.202(a).				planned special exposure at the NTS.				
204(d) Prior to a planned special exposure, written consent shall be obtained from each individual involved. Each such written consent shall include: (1) The purpose of the planned operations and procedures to be used; (2) The estimated doses and associated potential risks and specific radiological conditions and other hazards which might be involved in performing the task; and (3) Instructions on the measures to be taken to keep the dose ALARA considering other risks that may be	NV/YMP RCM 213.3. Planned special exposures are beyond the scope of operations conducted by NNSA/NSO or YMORD.	Revise: NV/YMP RCM 213.3. Planned special exposures are beyond the scope of operations conducted by NNSA/NSO or OCRWM.	Planned special exposures are beyond the scope of operations conducted by LLNL-N. LLNL will not conduct a planned special exposure at the NTS.	This is outside the scope of the LANL/NTS Radiological Control Program. Planned special exposures are beyond the scope of operations conducted by LANL at the NTS. LANL will not conduct a planned special exposure at the NTS.	Same as Column 3	Same as Column 3	The contents of this section are not applicable to DRI as there are no circumstances for planned special exposures to employees.	The contents of this section are not applicable to WSI/NV as there are no circumstances for planned special exposures to employees.

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present.								
204(e) Records of the conduct of a planned special exposure Shall be maintained and a written report submitted within 30 days after the planned special exposure to the approving organizations identified in §835.204(a) (3).	NV/YMP RCM 213.3. Planned special exposures are beyond the scope of operations conducted by NNSA/NSO or YMORD.	Revise: NV/YMP RCM 213.3. Planned special exposures are beyond the scope of operations conducted by NNSA/NSO or OCRWM.	Planned special exposures are beyond the scope of operations conducted by LLNL at the NTS. LLNL will not conduct a planned special exposure at the NTS.	This is outside the scope of the LANL/NTS Radiological Control Program. Planned special exposures are beyond the scope of operations conducted by LANL at the NTS. LANL will not conduct a planned special exposure at the NTS.	Same as Column 3	Same as Column 3	The contents of this section are not applicable to DRI as there are no circumstances for planned special exposures to employees.	The contents of this section are not applicable to WSI/NV as there are no circumstances for planned special exposures to employees.
204(f) The dose from planned special exposures is not to be considered in controlling future occupational dose of the individual under §835.202(a), but is to be included in records and reports required under this part.	NV/YMP RCM 213.3. Planned special exposures are beyond the scope of operations conducted by NNSA/NSO or YMORD.	Revise: NV/YMP RCM 213.3. Planned special exposures are beyond the scope of operations conducted by NNSA/NSO or OCRWM.	Planned special exposures are beyond the scope of operations conducted by LLNL at the NTS. LLNL will not conduct a planned special exposure at the NTS.	This is outside the scope of the LANL/NTS Radiological Control Program. Planned special exposures are beyond the scope of operations conducted by LANL at the NTS. LANL will not conduct a	Same as Column 3	Same as Column 3	The contents of this section are not applicable to DRI as there are no circumstances for planned special exposures to employees.	The contents of this section are not applicable to WSI/NV as there are no circumstances for planned special exposures to employees.

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	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference

				planned special exposure at the NTS.				
835.205 Determination of compliance for non- uniform exposure of the skin. 205(a) Non-uniform exposures of the skin from X-rays, beta radiation, and/or radioactive material on the skin are to be assessed as specified in this section.	NV/YMP RCM Appendix 2C-.01. Non-uniform exposures of the skin from X-rays, beta radiation, and radioactive materials on the skin, shall be assessed and recorded as specified in the following table. (Table 2C-1).	NV/YMP RCM Appendix 2C-.01. Non-uniform exposures of the skin from X-rays, beta radiation, and radioactive materials on the skin, shall be assessed and recorded as specified in the following table. (Table 2C-1).	Dosimetry services are provided to LLNL by the RSPC.	This is outside the scope of the LANL/NTS Radiological Control Program. The NTS RSPC and, by written agreement, the LANL RP-2 Dose Assessment Team perform the dose assessments for LANL/NTS. The LANL RP-2 Radiation Information Management Team records and maintains LANL employee dose assessments provided by the NTS RSPC.	Same as Column 3	NV/YMP RCM 141.3.e. The RSPC shall provide the following: e. External and internal dosimetry services.	Dosimetry services are provided to DRI by the RSPC.	By written agreement, dosimetry services are provided to WSI/NV by the RSPC.
205(b) For purposes of demonstrating compliance with §835.202(a)(4), assessments shall be	NV/YMP RCM Appendix 2C, Table 2C-1. Items 1, 2, and 3.	Revise and verify terminology: NV/YMP RCM Appendix 2C.	Dosimetry services are provided to LLNL by the RSPC.	This is outside the scope of the LANL/NTS Radiological Control Program.	Same as Column 3	NV/YMP RCM 141.3.e. The RSPC shall provide the following:	Dosimetry services are provided to DRI by the RSPC.	By written agreement, dosimetry services are provided to

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<p>conducted as follows:</p> <p>(1) Area of skin irradiated is 100 cm² or more. The non-uniform equivalent dose received during the year shall be averaged over the 100 cm² of the skin receiving the maximum dose, added to any uniform equivalent dose also received by the skin, and recorded as the equivalent dose to any extremity or skin for the year.</p> <p>(2) Area of skin irradiated is 10 cm² or more, but is less than 100 cm². The non-uniform equivalent dose (H) to the irradiated area received during the year shall be added to any uniform equivalent dose also received by the skin and recorded as the equivalent dose to any extremity or skin for the year. H is</p>		NV/YMP RCM Appendix 2C, Table 2C-1. Items 1, 2, and 3.		The NTS RSPC and, by written agreement, the LANL RP-2 Dose Assessment Team perform the dose assessments for LANL/NTS. The LANL RP-2 Radiation Information Management Team records and maintains LANL employee dose assessments provided by the NTS RSPC.		e. External and internal dosimetry services.		WSI/NV by the RSPC.

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<p>the equivalent dose averaged over the 1 cm² of skin receiving the maximum absorbed dose, D, reduced by the fraction f, which is the irradiated area in cm² divided by 100 cm² (i.e., H=fD). In no case shall a value of f less than 0.1 be used.</p> <p>(3) Area of skin irradiated is less than 10 cm². The non-uniform equivalent dose shall be averaged over the 1 cm² of skin receiving the maximum dose. This equivalent dose shall:</p> <p>(i) Be recorded in the individual's occupational exposure history as a special entry; and</p> <p>(ii) Not be added to any other equivalent dose to any extremity or skin-for the year.</p>								
835.206 limits for the embryo/fetus.	NV/YMP RCM 215.1.a. For a	Revise: NV/YMP RCM 215.1.a.	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	As part of our ALARA	Same as Column 3

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206(a) The equivalent dose limit for the embryo/fetus from the period of conception to birth, as a result of occupational exposure of a declared pregnant worker, is 0.5 rem (0.005 Sv).	declared pregnant worker who chooses to continue working as a radiological worker: a. The dose limit for the embryo/fetus from conception to birth (entire gestation period) is 500 mrem.	For a declared pregnant worker who chooses to continue working as a radiological worker: a. The equivalent dose limit for the embryo/fetus from conception to birth (entire gestation period) is 500 mrem.					commitment, DRI has adopted the policies and procedures outlined in the UNR RSM. Reference UNR RSM Policy III: Occupational Dose Limits and Contamination Standards. The allowed occupational dose to the declared pregnant worker/fetus may not exceed 0.5 rem/yr (Nevada Administrative Code NAC 459.325-3355).	
206(b) Substantial variation above a uniform exposure rate that would satisfy the limits provided in §835.206(a) shall be avoided.	NV/YMP RCM 215.1.b.01. For a declared pregnant worker who chooses to continue working as a radiological worker: b. Measures shall be taken to	NV/YMP RCM 215.1.b.01. For a declared pregnant worker who chooses to continue working as a radiological worker: b. Measures shall be taken to	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	As part of our ALARA commitment, DRI has adopted the policies and procedures outlined in the UNR RSM. Reference UNR RSM Policy III:	Same as Column 3

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	avoid substantial variation above the uniform exposure rate necessary to meet the 500 mrem limit for the gestation period.	avoid substantial variation above the uniform exposure rate necessary to meet the 500 mrem limit for the gestation period.					Occupational Dose Limits and Contamination Standards. UNR has set the administrative limit to the fetus as 50 mrem/yr (10% of the regulatory limit).	
206(c) If the equivalent dose to the embryo/fetus is determined to have already exceeded 0.5 rem (0.005 Sv) by the time a worker declares her pregnancy, the declared pregnant worker shall not be assigned to tasks where additional occupational exposure is likely during the remaining gestation period	NV/YMP RCM 215.2. If the dose to the embryo/fetus is determined to have already exceeded 500 mrem when a worker notifies her employer of her pregnancy, the worker shall not be assigned to tasks where additional occupational radiation exposure is likely during the remainder of the gestation period.	Revise: NV/YMP RCM 215.2. If the equivalent dose to the embryo/fetus is determined to have already exceeded 500 mrem when a worker notifies her employer of her pregnancy, the worker shall not be assigned to tasks where additional occupational radiation exposure is likely during the remainder of the gestation period.	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	As part of our ALARA commitment, DRI has adopted the policies and procedures outlined in the UNR RSM. Reference UNR RSM Policy III: Occupational Dose Limits and Contamination Standards. Dose to the fetus may not exceed 0.5 rem and dose to a pregnant worker shall not exceed 0.01 rem/month or 0.1 rem/yr.	Same as Column 3

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							Reassignment will take place if these limits are likely to be exceeded during the remainder of the gestation period.	
835.207 Occupational Dose Limits for Minors. The dose limits for minors occupationally exposed to radiation and/or radioactive materials at a DOE activity are 0.1 rem (0.001 Sv) total effective dose in a year and 10 percent of the occupational dose limits specified at §835.202(a)(3) and (a)(4).	NV/YMP RCM Table 2-1, Item 6.	NV/YMP RCM Table 2-1, Item 6.	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	As part of our ALARA commitment, DRI has adopted the policies and procedures outlined in the UNR RSM. Reference UNR RSM Policy III: Occupational Dose Limits and Contamination Standards. Exposures to minors shall not exceed 0.01 rem/month or 0.1 rem/yr.	Not applicable to WSI/NV. WSI/NV does not employ minors.
835.208 Limits for Members of the Public Entering A Controlled Area. The total effective dose limit for members	NV/YMP RCM 214.02. The TEDE limits for members of the public exposed to radiation	Revise: NV/YMP RCM 214.02. The TED limits for members of the public exposed to	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	As part of our ALARA commitment, DRI has adopted the policies and procedures	WSI/NV complies with the site-wide guidance for public access to controlled areas,

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of the public exposed to radiation and/or radioactive material during access to a controlled area is 0.1 rem (0.001 Sv in a year.	and/or radioactive material during access to a Controlled Area is 0.1 rem (0.001 sievert) in a year.	radiation and/or radioactive material during access to a Controlled Area is 0.1 rem (0.001 sievert) in a year.					outlined in the UNR RSM. Reference UNR RSM Policy III: Occupational Dose Limits and Contamination Standards. Exposures to the public shall not exceed 0.1 rem (0.001 Sv)/yr.	as defined by the RSPC.
835.209 Concentrations of Radioactive Material in Air. 209(a) The derived air concentration (DAC) values given in appendices A and C of this part shall be used in the control of occupational exposures to airborne radioactive material.	NV/YMP RCM 235.3. DAC values for use with Table 2-4 as found in 10 CFR 835 shall be used in the control of occupational exposure to airborne radioactive material.	NV/YMP RCM 235.3. DAC values for use with Table 2-4 as found in 10 CFR 835 shall be used in the control of occupational exposure to airborne radioactive material.	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3
209(b) The estimation of internal dose shall be based on bioassay data rather than air concentration values unless bioassay data are:	NV/YMP RCM 521.2. The determination of internal dose shall be based on bioassay data rather than air	NV/YMP RCM 521.2. The determination of internal dose shall be based on bioassay data rather than air	Same as Column 3	This is outside the scope of the LANL/NTS Radiological Control Program. The NTS RSPC and, by written	Same as Column 3	Same as Column 3 and NV/YMP RCM 141.3.e. The RSPC shall provide the following: (e) External and	Not applicable to DRI. Dosimetry services are provided to DRI by the RSPC.	Not applicable to WSI/NV. By written agreement, the RSPC provides dosimetry services to

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(1) unavailable; (2) inadequate; or (3) internal dose estimates based on air concentration values are demonstrated to be as or more accurate.	concentration values unless bioassay data are: a. Unavailable. b. Inadequate. c. Internal dose estimates based on representative air concentration values are demonstrated to be as or more accurate.	concentration values unless bioassay data are: a. Unavailable. b. Inadequate. c. Internal dose estimates based on representative air concentration values are demonstrated to be as or more accurate.		agreement, the LANL RP-2 Dose Assessment Team perform the dose assessments for LANL/NTS. The LANL RP-2 Radiation Information Management Team records and maintains LANL employee dose assessments provided by the NTS RSPC.		internal dosimetry services.		WSI/NV.
Subpart D - [Reserved]								
Subpart E- Monitoring of Individuals and Areas. 835.401 General Requirements. 401(a) Monitoring of individuals and areas shall be performed to: (1) Demonstrate compliance with the	NV/YMP RCM 551.1. Monitoring of individuals and areas shall be performed to: a. Demonstrate compliance with the regulations in 10 CFR 835 - Subpart E- "Monitoring of Individuals and	Revise: NV/YMP RCM 551.1. Monitoring of individuals and areas shall be performed to: a. Demonstrate compliance with the regulations in 10 CFR 835 - Subpart E- "Monitoring of Individuals and	The NTS RSPC provides trained and qualified Radiological Control Technicians to perform and document radiological surveys per NTS RSPC procedures compliant with	The NTS RSPC provides trained and qualified Radiological Control Technicians to perform and document radiological surveys per NTS RSPC procedures compliant with	Workplace monitoring for Sandia activities provided by RSPC.	Same as Column 3	Not a DRI activity. These activities are performed by the RSPC. Where DRI has the lead responsibility for engineering and administrative controls, DRI will access data generated by the	WSI/NV does not have any Radiological Areas that require monitoring. By written agreement, the RSPC provides monitoring of individuals and resulting records, surveys, and

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regulations in this part; (2) Document radiological conditions; (3) Detect changes in radiological conditions; (4) Detect the gradual buildup of radioactive material; (5) Verify the effectiveness of engineered and administrative controls in containing radioactive material and reducing radiation exposure; and (6) Identify and control potential sources of individual exposure to radiation and/or radioactive material.	Areas.” b. Document radiological conditions. c. Detect changes in radiological conditions. d. Detect the gradual buildup of radioactive material. e. Verify the effectiveness of engineering and administrative controls in containing radioactive material and reducing radiation exposures. f. Identify and control potential sources of individual exposure to radiation and/or radioactive material. NV/YMP RCM	Areas.” b. Document radiological conditions. c. Detect changes in radiological conditions. d. Detect the gradual buildup of radioactive material. e. Verify the effectiveness of engineered and administrative controls in containing radioactive material and reducing radiation exposures. f. Identify and control potential sources of individual exposure to radiation and/or radioactive material. NV/YMP RCM	10 CFR 835. LLNL determines radiological survey parameters.	10 CFR 835. LANL/NTS determines radiological survey parameters.			RSPC to determine their effectiveness. Where DRI is the lead agency on a project, DRI will access data generated by the RSPC to determine potential sources of exposure and will implement appropriate control measures.	workplace monitoring.

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	<p>551.6. Surveys shall be performed before, during, and at the completion of work that has the potential for causing changes in radiation exposure/dose rates or contamination levels.</p> <p>NV/YMP RCM 551.7. Survey frequencies should be established based on potential radiological conditions, probability of change in conditions, and area occupancy factors.</p> <p>NV/YMP RCM 711.01. Radiological</p>	<p>551.6. Surveys shall be performed before, during, and at the completion of work that has the potential for causing changes in radiation exposure/dose rates or contamination levels.</p> <p>NV/YMP RCM 551.7. Survey frequencies should be established based on potential radiological conditions, probability of change in conditions, and area occupancy factors.</p> <p>NV/YMP RCM 711.01. Radiological</p>						

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	control records shall be maintained as necessary to document compliance with the requirements of 10 CFR 835.	control records shall be maintained as necessary to document compliance with the requirements of 10 CFR 835.						
401(b) Instruments and equipment used for monitoring shall be: (1) Periodically maintained and calibrated on an established frequency; (2) Appropriate for the type(s), levels, and energies of the radiation(s) encountered; (3) Appropriate for existing environmental conditions; and (4) Routinely tested for operability.	NV/YMP RCM 551.2. Instruments and equipment used for monitoring shall be: a. Periodically maintained and calibrated on an established frequency. b. Appropriate for the type(s), levels, and energies of radiation(s) encountered. c. Appropriate for existing environmental conditions. d. Routinely tested for operability.	NV/YMP RCM 551.2. Instruments and equipment used for monitoring shall be: a. Periodically maintained and calibrated on an established frequency. b. Appropriate for the type(s), levels, and energies of radiation(s) encountered. c. Appropriate for existing environmental conditions. d. Routinely tested for operability.	This service is provided to LLNL by the NTS RSPC in compliance with 10 CFR 835. NV/YMP RCM 551.2.b-d. Instruments and equipment used for monitoring shall be: b. Appropriate for the type(s), levels, and energies of radiation(s) encountered. c. Appropriate for existing environmental conditions. d. Routinely tested for	The calibration and maintenance of instruments and equipment are outside the scope of the LANL/NTS Radiological Control Program. These services are provided to LANL/NTS by the NTS RSPC in compliance with 10 CFR 835. Selection of instruments and equipment appropriate for the types, levels, and energies of the radiation(s) encountered, selection of	Instruments for workplace monitoring in Sandia operations provided by RSPC. Responsibilities of RSPC with Sandia oversight. Responsibility of RSPC to determine environmental constraints of instruments being used. Instruments provided by RSPC and used exclusively by RSPC personnel.	Same as Column 3	Not a DRI activity. Instruments and equipment used for monitoring are provided by the RSPC and used exclusively by RSPC personnel. Therefore, it is their responsibility to determine environmental constraints of instruments being used.	By written agreement, the RSPC provides instruments and equipment used for monitoring. It is the responsibility of the RSPC to maintain and calibrate instruments and equipment used for monitoring, to ensure the instruments and equipment used for monitoring are appropriate for the type(s), level(s), and energies of the radiation(s) encountered, to ensure the

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	<p>NV/YMP RCM 562.1.01. Radiological instruments shall be used only to measure the radiation for which their calibrations are valid.</p> <p>NV/YMP RCM 562.4. The effects of environmental conditions on an instrument, including interfering radiation, shall be known before use.</p> <p>NV/YMP RCM 551.4.01. Instruments used to perform radiation surveys shall be readily available and performance-checked daily or before operation.</p>	<p>NV/YMP RCM 562.1.01. Radiological instruments shall be used only to measure the radiation for which their calibrations are valid.</p> <p>NV/YMP RCM 562.4. The effects of environmental conditions on an instrument, including interfering radiation, shall be known before use.</p> <p>NV/YMP RCM 551.4.01. Instruments used to perform radiation surveys shall be readily available and performance-checked daily or before operation.</p>	operability.	<p>instruments appropriate to environmental conditions, and routine testing for operability are LANL/NTS responsibilities.</p> <p>NV/YMP RCM 551.2.b. Instruments and equipment used for monitoring shall be:</p> <p>b. Appropriate for the type(s), levels, and energies of radiation(s) encountered.</p>				instruments and equipment used for monitoring are appropriate for existing environmental conditions, and to ensure the instruments and equipment used for monitoring are routinely tested for operability.

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835.402 Individual Monitoring. 402(a) For the purpose of monitoring individual exposures to external radiation, personnel dosimeters shall be provided to and used by: (1) Radiological workers who, under typical conditions, are likely to receive one or more of the following: (i) An effective dose of 0.1 rem (0.001 Sv) or more in a year; (ii) An equivalent dose to the skin or to any extremity of 5 rems (0.05 Sv) or more in a year; (iii) An equivalent dose to the lens of the eye of 1.5 rems (0.015 Sv) or more in a year; (2) Declared pregnant workers who are likely to receive from external sources an equivalent dose to the embryo/fetus in	NV/YMP RCM 511.1.a. Individual dosimetry shall be required for the following: a. Individuals who under typical conditions are likely to receive an annual external whole-body dose greater than 100 mrem or an annual dose to the extremities or organs and other tissues (including the lens of the eye and skin) greater than 10 percent of the corresponding limits specified in Table 2-1. NV/YMP RCM 511.1.b. Individual dosimetry shall be required for the following:	Revise: NV/YMP RCM 511.1. Individual dosimetry shall be required for the following: a. Radiological workers who under typical conditions are likely to receive an effective dose of 100 mrem or more in a year, an equivalent dose to the skin or to any extremity of 5 rems or more in a year, or an equivalent dose to the lens of the eye of 1.5 rems or more in a year or greater than 10 percent of the corresponding limits specified in Table 2-1. b. Declared pregnant workers who are	Same as Column 3 and LLNL-N will have the responsibility to determine which Livermore personnel need dosimetry.	Same as Column 3	Same as Column 3 and SNL-NV will have the responsibility to determine which Sandia personnel need dosimetry. Dosimeters are provided and processed by RSPC.	Same as Column 3	Same as Column 3 and Cross reference NV/YMP RCM 511.1.f. and Table 6-1, Item 7. Dosimetry will be required should DRI employees enter a High Radiation Area. Entry into Very High Radiation Areas will not be permitted.	Same as Column 3 and (revised) NV/YMP RCM 511.1.a. b. and f. Individual dosimetry shall be required for the following: a. Radiological workers who under typical conditions are likely to receive an effective dose of 100 mrem or more in a year, an equivalent dose to the skin or to any extremity of 5 rems or more in a year, or an equivalent dose to the lens of the eye of 1.5 rems or more in a year or greater than 10 percent of the corresponding limits specified in Table 2-1. b. Declared

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<p>excess of 10 percent of the applicable limit at §835.206(a). (3) Occupationally exposed minors likely to receive a dose in excess of 50 percent of the applicable limits in §835.207 in a year from external sources; (4) Members of the public entering a controlled area likely to receive a dose in excess of 50 percent of the limit at §835.208 in a year from external sources; and (5) Individuals entering a high or very high radiation area.</p>	<p>b. Declared pregnant workers who are expected to receive from external sources a dose equivalent of 50 mrem or more to the embryo/fetus during the gestation period.</p> <p>NV/YMP RCM 511.1.c. Individual dosimetry shall be required for the following: c. Occupationally exposed minors and members of the public likely to receive an annual external whole-body dose equivalent of 50 mrem or more in a year.</p> <p>NV/YMP RCM 511.1.d. Individual</p>	<p>expected to receive from external sources an equivalent dose of 50 mrem or more to the embryo/fetus during the gestation period. c. Occupationally exposed minors and members of the public likely to receive a total effective dose of 50 mrem or more in a year. d. Occupationally exposed minors likely to receive an equivalent dose of 1.5 rems to the lens of the eye. e. Occupationally exposed minors likely to receive the sum of the skin or an extremity for external exposures and the committed</p>						<p>pregnant workers who are expected to receive from external sources an equivalent dose of 50 mrem or more to the embryo/fetus during the gestation period. f. Individuals entering a High Radiation Area.</p> <p>835.402 (a) (3) and (4) is not applicable to WSI/NV. WSI/NV does not employ minors and does not have radiological control responsibilities for members of the public entering a controlled area.</p> <p>WSI/NV is responsible for determining</p>

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	dosimetry shall be required for the following: d. Individuals entering a High Radiation Area. NV/YMP RCM Table 6-1 Item 7. Entry into Very High Radiation Areas Not Permitted.	equivalent dose to the skin or to any extremity of 5 rems. f. Individuals entering a High Radiation Area. NV/YMP RCM Table 6-1 Item 7. Entry into Very High Radiation Areas Not Permitted.						which WSI personnel need dosimetry.
402(b) External dose monitoring programs implemented to demonstrate compliance with §835.402(a) shall be adequate to demonstrate compliance with the dose limits established in subpart C of this part and shall be: (1) Accredited, or excepted from accreditation, in accordance with the DOE Laboratory Accreditation Program for Personnel	NV/YMP RCM 512.1. 10 CFR 835 requires accreditation of personnel external dosimetry monitoring programs by NNSA/NSO or YMORD external dosimetry programs shall be DOELAP accredited.	Revise: NV/YMP RCM 512.1. The RSPC shall maintain an external monitoring program that is adequate to demonstrate compliance with Subpart C of 10 CFR 835 and that is accredited in accordance with DOELAP.	This service is provided to LLNL at the NTS by the RSPC or LLNL-Livermore. LLNL-N will verify that the RSPC standards in this requirement by insuring their programs are accredited by the DOELAP for personnel dosimetry.	This is outside the scope of the LANL/NTS Radiological Control Program. This service is provided to LANL at the NTS by the NTS RSPC in compliance with 10 CFR 835.	SNL utilizes the dosimetry services provided by the RSPC, which is DOELAP accredited. SNL-NV is responsible for assuring that the proper dosimetry is used by personnel engaged in SNL activities at NTS.	NV/YMP RCM 141.3.e. The RSPC shall provide the following: e. External and internal dosimetry services.	Not applicable to DRI. Dosimetry services, including external dose monitoring are provided to DRI by RSPC.	By written agreement, dosimetry services are provided to WSI/NV by the RSPC. WSI will verify that the RSPC maintains DOELAP accreditation.

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Dosimetry; or (2) Determined by the Secretarial Officer responsible for environment, safety and health matters to have performance substantially equivalent to that of programs accredited under the DOE Laboratory Accreditation Program for Personnel Dosimetry.								
402(c) For the purpose of monitoring individual exposures to internal radiation, internal dosimetry programs (including routine bioassay programs) shall be conducted for: (1) Radiological workers who, under typical conditions, are likely to receive a committed effective dose of 0.1 rem (0.001 Sv) or more from all occupational radionuclide intakes in	NV/YMP RCM 521.1. The following individuals shall participate in an internal dosimetry program: a. Individuals entering radiological areas who under typical conditions are likely to receive intakes resulting in a CEDE of 100 mrem or	Revise: NV/YMP RCM 521.1. The following individuals shall participate in an internal dosimetry program: a. Radiological Workers entering radiological areas who under typical conditions are likely to receive intakes resulting in a CED of 100 mrem or more in	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	Internal exposure monitoring services are provided by RSPC at the request of DRI. Revise: NV/YMP RCM 214.01. Members of the public who are permitted access to NNSA/NSO and OCRWM Controlled Areas shall be limited to an annual radiation dose of	NV/YMP RCM 521.1.a-b. The following individuals shall participate in an internal dosimetry program: a. Individuals entering radiological areas who under typical conditions are likely to receive intakes resulting in a CED of 100 mrem or

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<p>a year; (2) Declared pregnant workers likely to receive an intake or intakes resulting in an equivalent dose to the embryo/fetus in excess of 10 percent of the limit stated at §835.206(a); (3) Occupationally exposed minors who are likely to receive a dose in excess of 50 percent of the applicable limit stated at §835.207 from all radionuclide intakes in a year; or (4) Members of the public entering a controlled area likely to receive a dose in excess of 50 percent of the limit stated at §835.208 from all radionuclide intakes in a year.</p>	<p>more in a year. b. Declared pregnant workers likely to receive intakes resulting in a dose equivalent to the embryo/fetus of 50 mrem or more during the gestation period. c. Occupationally exposed minors and members of the public likely to receive intakes resulting in a CEDE of 50 mrem or more in a year.</p>	<p>a year. b. Declared pregnant workers likely to receive intakes resulting in an equivalent dose to the embryo/fetus of 50 mrem or more during the gestation period. c. Occupationally exposed minors and members of the public likely to receive intakes resulting in a CED of 50 mrem or more in a year.</p>					<p>100 millirem from the sum of doses received from internal and external radiation sources.</p>	<p>more in a year. b. Declared pregnant workers likely to receive intakes resulting in an equivalent dose to the embryo/fetus of 50 mrem or more during the gestation period.</p> <p>835.402(c) (3) and (4) is not applicable to WSI/NV. WSI does not employ minors or control members of the public entering a controlled area.</p>
402(d) Internal dose monitoring programs implemented to demonstrate compliance with	NV/YMP RCM 522.1. 10 CFR 835 requires accreditation of the internal	NV/YMP RCM 522.1. 10 CFR 835 requires accreditation of the internal	This service is provided to LLNL at the NTS by the RSPC or LLNL-Livermore	This is outside the scope of the LANL/NTS Radiological Control Program.	SNL-NV has the responsibility to determine which SNL personnel should	NV/YMP RCM 141.3.e. The RSPC shall provide the following:	Not applicable to DRI. This service is provided by the RSPC and it is	By written agreement, dosimetry services are provided by the

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§835.402(c) shall be adequate to demonstrate compliance with the dose limits established in subpart C of this part and shall be: (1) Accredited, or excepted from accreditation, in accordance with the DOE Laboratory Accreditation Program for Radiobioassay; or (2) Determined by the Secretarial Officer responsible for environment, safety and health matters to have performance substantially equivalent to that of programs accredited under the DOE Laboratory Accreditation Program for Radiobioassay.	radiobioassay monitoring program by DOELAP. The RSPC internal radiobioassay program shall be DOELAP accredited.	radiobioassay monitoring program by DOELAP. The RSPC internal radiobioassay program shall be DOELAP accredited.	or LANL-New Mexico. LLNL-N will verify that the RSPC meets the standards in this requirement by participating in the 36 month internal audit program.	The NTS RSPC and, by written agreement, the LANL RP-2 Dose Assessment Team perform the dose assessments for LANL/NTS. The LANL RP-2 Radiation Information Management Team records and maintains LANL employee dose assessments provided by the NTS RSPC.	participate in an internal dosimetry program.	(e) External and internal dosimetry services.	their responsibility to be DOELAP accredited.	RSPC. It is the responsibility of the RSPC to have the program accredited by DOELAP. WSI/NV will verify that the RSPC maintains DOELAP accreditation.
835.403 Air Monitoring. 403(a) Monitoring of airborne radioactivity shall be performed:	NV/YMP RCM 555.1. Monitoring of airborne radioactivity shall be performed:	NV/YMP RCM 555.1. Monitoring of airborne radioactivity shall be performed:	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	Not applicable to DRI. This service is provided by the RSPC.	By written agreement, the RSPC performs air monitoring.

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<p>(1) Where an individual is likely to receive an exposure of 40 or more DAC-hours in a year; or</p> <p>(2) As necessary to characterize the airborne radioactivity hazard where respiratory protective devices for protection against airborne radionuclides have been prescribed.</p>	<p>a. Where an individual is likely to receive an exposure of 40 or more DAC-hours in a year.</p> <p>b. As necessary to characterize the airborne radioactivity hazard where respiratory protective devices for protection against airborne radionuclides have been prescribed.</p>	<p>a. Where an individual is likely to receive an exposure of 40 or more DAC-hours in a year.</p> <p>b. As necessary to characterize the airborne radioactivity hazard where respiratory protective devices for protection against airborne radionuclides have been prescribed.</p>						
403(b) Real-time air monitoring, shall be performed as necessary to detect and provide warning of airborne radioactivity concentrations that warrant immediate action to terminate inhalation of airborne radioactive material.	NV/YMP RCM 555.2. Real-time air monitoring shall be performed, as necessary, to detect and provide warning of airborne radioactivity concentrations that warrant immediate action to terminate	NV/YMP RCM 555.2. Real-time air monitoring shall be performed, as necessary, to detect and provide warning of airborne radioactivity concentrations that warrant immediate action to terminate	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	Not applicable to DRI. This service is provided by the RSPC.	By written agreement, the RSPC performs air monitoring.

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	inhalation of airborne radioactive material.	inhalation of airborne radioactive material.						
835.404 [Reserved]								
835.405 Receipt of Packages Containing Radioactive Material. 405(a) If packages containing quantities of radioactive material in excess of a Type A quantity (as defined at 10 CFR 71.4) are expected to be received from radioactive material transportation, arrangements shall be made to either: (1) Take possession of the package when the carrier offers it for delivery; or (2) Receive notification as soon as practicable after arrival of the package at the carrier's terminal and to take possession of the package	NV/YMP RCM 423.4.a. Receipt of packages containing radioactive material: a. When packages containing quantities of radioactive material in excess of Type A quantity (as defined in 10 CFR 71.4) are expected to be received from radioactive material transportation, arrangements shall be made to either: (1) Take possession of the package when the carrier	NV/YMP RCM 423.4.a. Receipt of packages containing radioactive material: a. When packages containing quantities of radioactive material in excess of Type A quantity (as defined in 10 CFR 71.4) are expected to be received from radioactive material transportation, arrangements shall be made to either: (1) Take possession of the package when the carrier	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	Not applicable to DRI. All radioactive material used by DRI employees need to be approved by the UNR radiation safety committee as required by the UNR Radioactive Material License 16.13-0003-07. DRI will follow UNR Radiation Safety Procedure III: Radiation source control for any radioactive material in excess of Type A quantities.	Receipt of packages containing radioactive material is outside the scope of WSI/NV activities.

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expeditiously after receiving such notification.	offers it for delivery; or (2) Receive notification as soon as practical after arrival of the package at the carrier's terminal and take possession of the package expeditiously after receiving such notification.	offers it for delivery; or (2) Receive notification as soon as practical after arrival of the package at the carrier's terminal and take possession of the package expeditiously after receiving such notification.						
405(b) Upon receipt from radioactive material transportation, external surfaces of packages known to contain radioactive material shall be monitored if the package: (1) Is labeled with a Radioactive White I, Yellow II or Yellow III label (as specified at 49 CFR 172.403 and 172.436-440); or (2) Has been transported as low specific activity	NV/YMP RCM 423.4.b. Receipt of packages containing radioactive material: b. Upon receipt from radioactive material transportation, external surfaces of the packages known to contain radioactive material shall be monitored if the package: (1) Is labeled with a	NV/YMP RCM 423.4.b. Receipt of packages containing radioactive material: b. Upon receipt from radioactive material transportation, external surfaces of the packages known to contain radioactive material shall be monitored if the package: (1) Is labeled with a	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	Not applicable to DRI. Under the UNR Radioactive Material License number 16-13-0003-07, DRI must follow the UNR radioactive material receipt procedure as outlined in UNR Radiation Safety Procedure III: Radiation Source Control.	By written agreement, the RSPC performs this service.

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material (as defined at 10 CFR 71.4) on an exclusive use vehicle (as defined at 10 CFR 71.4); or (3) Has evidence of degradation, such as packages that are crushed, wet, or damaged.	Radioactive White I, Yellow II, or Yellow III label (as specified in 49 CFR 172.403 and 172.436-440). (2) Has been transported as low specific activity material (as defined in 49 CFR 71.4) on an exclusive use vehicle (as defined in 10 CFR 71.4). (3) Has evidence of degradation, such as packages that are crushed, wet, or damaged.	Radioactive White I, Yellow II, or Yellow III label (as specified in 49 CFR 172.403 and 172.436-440). (2) Has been transported as low specific activity material (as defined in 49 CFR 71.4) on an exclusive use vehicle (as defined in 10 CFR 71.4). (3) Has evidence of degradation, such as packages that are crushed, wet, or damaged.						
405(c) The monitoring required by paragraph (b) of this section shall include: (1) Measurements of removable contamination levels, unless the package contains only special form (as defined at 10	NV/YMP RCM 423.4.c. Receipt of packages containing radioactive material: c. The monitoring required by Article 423.4.b shall include:	Revise: NV/YMP RCM 423.4.c. Receipt of packages containing radioactive material: c. The monitoring required by Article 423.4.b	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	Not applicable to DRI. Under the UNR Radioactive Material License number 16-13-0003-07, DRI must follow the UNR radioactive material receipt	By written agreement, the RSPC provides monitoring.

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CFR 71.4) or gaseous radioactive material; and (2) Measurements of the radiation levels, if the package contains a Type B quantity (as defined at 10 CFR 71.4) of radioactive material.	(1) Measurements of removable contamination levels, unless the package contains only special form, (as defined in 10 CFR 71.4) or gaseous radioactive material. (2) Measurements of the radiation levels, unless the package contains less than a Type A quantity (as defined in 10 CFR 71.4) of radioactive material.	shall include: (1) Measurements of removable contamination levels, unless the package contains only special form, (as defined in 10 CFR 71.4) or gaseous radioactive material. (2) Measurements of the radiation levels, if the package contains a Type B quantity (as defined at 10 CFR 71.4) of radioactive material.					procedure as outlined in UNR Radiation Safety Procedure III: Radiation Source Control.	
405(d) The monitoring required by paragraph (b) of this section shall be completed as soon as practicable following receipt of the package, but not later than 8 hours after the	NV/YMP RCM 423.4.d. Receipt of packages containing radioactive material. d. The monitoring	NV/YMP RCM 423.4.d. Receipt of packages containing radioactive material. d. The monitoring	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	Not applicable to DRI. Under the UNR Radioactive Material License number 16-13-0003-07, DRI must follow the UNR radioactive	By written agreement, the RSPC provides monitoring.

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beginning of the working day following receipt of the package.	required by Article 423.4.b shall be completed as soon as practical following receipt of the package, but not later than 8 hours after the beginning of the working day following receipt of the package.	required by Article 423.4.b shall be completed as soon as practical following receipt of the package, but not later than 8 hours after the beginning of the working day following receipt of the package.					material receipt procedure as outlined in UNR Radiation Safety Procedure III: Radiation Source Control.	
405(e) Monitoring pursuant to § 835.405(b) is not required for packages transported on a DOE site which have remained under the continuous observation and control of a DOE employee or DOE contractor employee who is knowledgeable of and implements required exposure control measures.		Add: NV/YMP RCM 423.4.e The Monitoring required by Article 423.4.b is not required for packages transported on site which have remained under the continuous observation and control of a DOE employee or DOE contractor employee who is knowledgeable of and implements required	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3

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		exposure control measures.						
Subpart F-Entry Control Program 835.501 Radiological Areas. 501(a) Personnel entry control shall be maintained for each radiological area.	NV/YMP RCM 334.7.01 and 335.5.01. Written authorizations shall be required to control entry into and permit work to be performed within radiological areas.	NV/YMP RCM 334.7.01 and 335.5.01. Written authorizations shall be required to control entry into and permit work to be performed within radiological areas.	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	NV/YMP RCM 322.2. Radiological Work Permits (RWPs) or alternative, formal mechanism as described in Article 322.9 shall be used to control the following activities: a. Entering Radiation Areas. b. Entering Contamination Areas. c. Handling materials with removable contamination that exceed the values of Table 2-2. DRI does not have any Radiological Control areas,	WSI/NV does not have radiological control responsibilities for any radiological area. The RSPC or TO who has radiological control responsibilities for the radiological area is responsible for ensuring that the requirements of this section are met. WSI/NV personnel will comply with all requirements established by the RSPC or TO.

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							but will comply with the requirements established by the RSPC or the RWP as applicable.	
501(b) The degree of control shall be commensurate with existing and potential radiological hazards within the area.	NV/YMP RCM 322.8. The degree of personnel entry control for radiological areas shall be commensurate with existing and potential radiological hazards within the area. NV/YMP RCM 334.7 02 and 335.5.02. These authorizations shall specify radiation protection measures commensurate with the existing and potential hazards.	NV/YMP RCM 322.8. The degree of personnel entry control for radiological areas shall be commensurate with existing and potential radiological hazards within the area. NV/YMP RCM 334.7 02 and 335.5.02. These authorizations shall specify radiation protection measures commensurate with the existing and potential hazards.	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	DRI does not have any Radiological Control areas, but will comply with the requirements established by the RSPC or the RWP as applicable.	WSI/NV does not have radiological control responsibilities for any radiological area. The RSPC or TO who has radiological control responsibilities for the radiological area is responsible for ensuring that the requirements of this section are met. WSI/NV personnel will comply with all requirements established by the RSPC or TO.

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501(c) One or more of the following methods shall be used to ensure control: (1) Signs and barricades; (2) Control devices on entrances; (3) Conspicuous visual and/or audible alarms; (4) Locked entrance ways; or (5) Administrative controls.	NV/YMP 231.1.01. Radiological postings shall be used to alert personnel to the presences of radiation and radioactive materials and to aid them in minimizing exposures and preventing the spread of contamination. NV/YMP RCM 231.7. Rope, tape, chain, and similar barriers used to designate the boundaries of posted areas should be yellow or yellow and magenta in color. Existing barb wire, chain link, yellow rope, or snow fencing is acceptable at	NV/YMP 231.1.01. Radiological postings shall be used to alert personnel to the presences of radiation and radioactive materials and to aid them in minimizing exposures and preventing the spread of contamination. Revise: NV/YMP RCM 231.7. Rope, tape, chain, and similar barriers used to designate the boundaries of posted areas should be yellow or yellow and magenta in color. Existing barb wire, chain link, yellow rope, or snow fencing is	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	DRI does not have any Radiological Control areas, but will comply with the requirements established by the RSPC or the RWP as applicable when working in areas which require these controls.	WSI/NV does not have radiological control responsibilities for any radiological area. The RSPC or TO who has radiological control responsibilities for the radiological area is responsible for ensuring that the requirements of this section are met. WSI/NV personnel will comply with all requirements established by the RSPC or TO.

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	<p>NNSA/NSO or YMORD facilities. These barriers shall be setup such that they do not impede the intended use of emergency exits or evacuation routes.</p> <p>NV/YMP 231.8. Posting of doors or access gates should be such that the postings remain visible when the doors and gates are open or closed.</p> <p>NV/YMP RCM 334.2. Physical controls to prevent inadvertent or unauthorized access to High and Very High Radiation Areas shall be maintained</p>	<p>acceptable at NNSA/NSO or OCRWM facilities. These barriers shall be setup such that they do not impede the intended use of emergency exits or evacuation routes.</p> <p>NV/YMP 231.8. Posting of doors or access gates should be such that the postings remain visible when the doors and gates are open or closed.</p> <p>NV/YMP RCM 334.2. Physical controls to prevent inadvertent or unauthorized access to High and Very High Radiation Areas shall be</p>						

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	<p>according to Appendix 3A.</p> <p>NV/YMP RCM 322.1. RWPs shall be used to control the following activities:</p> <ul style="list-style-type: none"> a. Entering High Radiation Areas. b. Entering High Contamination Areas. c. Entering Airborne Radioactivity Areas. <p>NV/YMP RCM 322.2. RWPs or an alternative formal mechanism described in Article 322.9 shall be used to control the following activities: a. Entering Radiation Areas. b. Entering</p>	<p>maintained according to Appendix 3A.</p> <p>NV/YMP RCM 322.1. RWPs shall be used to control the following activities:</p> <ul style="list-style-type: none"> a. Entering High Radiation Areas. b. Entering High Contamination Areas. c. Entering Airborne Radioactivity Areas. <p>NV/YMP RCM 322.2. RWPs or an alternative formal mechanism described in Article 322.9 shall be used to control the following activities: a. Entering Radiation Areas.</p>						

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	Contamination Areas. c. Handling materials with removable contamination that exceed the values of Table 2-2.	b. Entering Contamination Areas. c. Handling materials with removable contamination that exceed the values of Table 2-2.						
501(d) Written authorizations shall be required to control entry into and perform work within radiological areas. These authorizations shall specify radiation protection measures commensurate with the existing and potential hazards.	NV/YMP RCM 382.3. Written authorizations, including specific radiation protection measures, shall be required to control entry into and work within radiological areas. These authorizations may include RWPs, technical work documents, administrative procedures, and other administrative controls.	NV/YMP RCM 382.3. Written authorizations, including specific radiation protection measures, shall be required to control entry into and work within radiological areas. These authorizations may include RWPs, technical work documents, administrative procedures, and other administrative controls.	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	DRI does not have any radiological areas but will comply with the requirements established by the cognizant TO.	WSI/NV does not have radiological control responsibilities for any radiological area. The RSPC or TO who has radiological control responsibilities for the radiological area is responsible for ensuring that the requirements of this section are met. WSI/NV personnel will comply with all requirements established by the RSPC or TO.

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501(e) No control(s) shall be installed at any radiological area exit that would prevent rapid evacuation of personnel under emergency conditions.	NV/YMP RCM Appendix 3A.3. Physical access controls over High and Very High Radiation Areas shall be established in such a way that they do not prevent a person from leaving the area. NV/YMP RCM 231.7.03. These barriers shall be set up such that they do not impede the intended use of emergency exits or evacuation routes.	NV/YMP RCM Appendix 3A.3. Physical access controls over High and Very High Radiation Areas shall be established in such a way that they do not prevent a person from leaving the area. NV/YMP RCM 231.7.03. These barriers shall be set up such that they do not impede the intended use of emergency exits or evacuation routes.	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	Not a DRI activity. This service is provided to DRI by the RSPC.	WSI/NV does not have radiological control responsibilities for any radiological area. The RSPC or TO who has radiological control responsibilities for the radiological area is responsible for ensuring that the requirements of this section are met. WSI/NV personnel will comply with all requirements established by the RSPC or TO.
835.502 High and Very High Radiation Areas. 502(a) The following measures shall be implemented for each entry into a high radiation area;	NV/YMP RCM 334.3.c and e. The minimum requirements for entry into High Radiation Areas shall include the following: c. Primary and	Revise: NV/YMP RCM 334.3.c and e. The minimum requirements for entry into High Radiation Areas shall include the following:	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	DRI does not typically conduct work in areas of high radiation. Should entry be required, monitoring and dosimetry service would be	The content of this section does not apply to WSI/NV, as WSI/NV personnel are not permitted to enter high or very high

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<p>(1) The area shall be monitored as necessary during access to determine the exposure rates to which the individuals are exposed; and</p> <p>(2) Each individual shall be monitored by a supplemental dosimetry device or other means capable of providing an immediate estimate of the individual's integrated equivalent dose to the whole body during the entry.</p>	<p>supplemental dosimeters or other means to immediately estimate deep dose.</p> <p>e. Area monitoring, as necessary, during access to determine the exposure rates to which the individuals are exposed.</p> <p>NV/YMP RCM 513.1.01. Pocket or electronic dosimeters shall be issued to personnel before entry into a High Radiation Area (see Article 334 for entry requirements).</p>	<p>c. Primary and supplemental dosimeters or other means to immediately estimate equivalent dose to the whole body.</p> <p>e. Area monitoring, as necessary, during access to determine the exposure rates to which the individuals are exposed.</p> <p>NV/YMP RCM 513.1.01. Pocket or electronic dosimeters shall be issued to personnel before entry into a High Radiation Area (see Article 334 for entry requirements).</p>					<p>provided to DRI by the RSPC and we would follow all compliance measures established by the cognizant TO.</p>	<p>radiation areas. If access were required, WSI/NV would comply with the measures established by the cognizant TO.</p>
502(b) Physical controls. One or more	NV/YMP RCM Appendix 3A 1.	Revise: NV/YMP RCM Appendix	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	DRI does not typically conduct	The content of this section does

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of the following controls shall be used for each entrance or access point to a high radiation area where radiation levels exist such that an individual could exceed an equivalent dose to the whole body of 1 rem (0.01 Sv) in any one hour at 30 centimeters from the source or from any surface that the radiation penetrates: (1) A control device that prevents entry to the area when high radiation levels exist or that, upon entry, causes the radiation level to be reduced below the level that defines a high radiation area; (2) A device that functions automatically to prevent use or operation of the radiation source or field while individuals are in the area;	a-f. 1. One or more of the following features should be used for each entrance or access point to a High Radiation Area and shall be used for each entrance or access point to a High Radiation Area where radiation levels exist such that a person could exceed a whole-body dose of 1 rem in any one hour: a. A control device that prevents entry to the area when high radiation levels exist or upon entry causes the radiation level to be reduced below that level defining a High	3A 1. a-f. 1. One or more of the following features should be used for each entrance or access point to a High Radiation Area and shall be used for each entrance or access point to a High Radiation Area where radiation levels exist such that a person could exceed an equivalent dose to the whole body of 1 rem in any one hour: a. A control device that prevents entry to the area when high radiation levels exist or upon entry causes the radiation level to be reduced below that level					work in areas of high radiation. Should entry be required, DRI will follow all compliance measures established by the cognizant TO.	not apply to WSI/NV, as WSI/NV personnel are not permitted to enter high or very high radiation areas. If access were required, WSI/NV would comply with the measures established by the cognizant TO.
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<p>(3) A control device that energizes a conspicuous visible or audible alarm signal so that the individual entering the high radiation area and the supervisor of the activity are made aware of the entry;</p> <p>(4) Entryways that are locked. During periods when access to the area is required, positive control over each entry is maintained;</p> <p>(5) Continuous direct or electronic surveillance that is capable of preventing unauthorized entry;</p> <p>(6) A control device that will automatically generate audible and visual alarm signals to alert personnel in the area before use or operation of the radiation source and in sufficient time to permit evacuation of the area or activation</p>	<p>Radiation Area.</p> <p>b. A device that functions automatically to prevent the use of or operation of the radiation source or field while personnel are in the area.</p> <p>c. A control device that energizes a conspicuous visible or audible alarm signal so that the person entering the High Radiation Area and the supervisor of the activity are made aware of the entry.</p> <p>d. Entryways that are locked, except during periods when access to the area is required, with positive control over each entry.</p>	<p>defining a High Radiation Area.</p> <p>b. A device that functions automatically to prevent the use of or operation of the radiation source or field while personnel are in the area.</p> <p>c. A control device that energizes a conspicuous visible or audible alarm signal so that the person entering the High Radiation Area and the supervisor of the activity are made aware of the entry.</p> <p>d. Entryways that are locked, except during periods when access to the area is required, with positive control over each</p>						

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of a secondary control device that will prevent use or operation of the source.	e. Continuous direct or electronic surveillance that is capable of preventing unauthorized entry. f. A control device that automatically generates audible and visual alarm signals to alert personnel in the area before use or operation of the radiation source and in sufficient time to permit evacuation of the area or activation of a secondary control device that will prevent the use of or operation of the source.	entry. e. Continuous direct or electronic surveillance that is capable of preventing unauthorized entry. f. A control device that automatically generates audible and visual alarm signals to alert personnel in the area before use or operation of the radiation source and in sufficient time to permit evacuation of the area or activation of a secondary control device that will prevent the use of or operation of the source.						
502(c) Very high radiation areas. In	NV/YMP RCM Appendix 3A. 2.	NV/YMP RCM Appendix 3A. 2.	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	Not applicable. DRI employees	The content of this section does

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addition to the above requirements, additional measures shall be implemented to ensure individuals are not able to gain unauthorized or inadvertent access to very high radiation areas.	In addition to the above requirements, additional measures shall be implemented to ensure personnel are not able to gain access to Very High Radiation Areas. NV/YMP RCM 334.4.01. Workers shall be prevented from entry to Very High Radiation Areas.	In addition to the above requirements, additional measures shall be implemented to ensure personnel are not able to gain access to Very High Radiation Areas. NV/YMP RCM 334.4.01. Workers shall be prevented from entry to Very High Radiation Areas.					do not enter Very High Radiation Areas.	not apply to WSI/NV, as personnel are not permitted to enter Very High Radiation Areas. If access were required, WSI/NV would comply with the measures established by the cognizant TO.
502(d) No control(s) shall be established in a high or very high radiation area that would prevent rapid evacuation of personnel.	NV/YMP RCM Appendix 3A.3. Physical access controls over High and Very High Radiation Areas shall be established in such a way that they do not prevent a person from leaving the area.	NV/YMP RCM Appendix 3A.3. Physical access controls over High and Very High Radiation Areas shall be established in such a way that they do not prevent a person from leaving the area.	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	Not applicable to DRI. DRI does not conduct work in High or Very High Radiation areas.	The content of this section does not apply to WSI/NV, as WSI/NV personnel are not permitted to enter High or Very High Radiation Areas. If access were required, WSI/NV would

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	NV/YMP RCM 231.7.03. These barriers shall be set up such that they do not impede the intended use of emergency exits or evacuation routes.	NV/YMP RCM 231.7.03. These barriers shall be set up such that they do not impede the intended use of emergency exits or evacuation routes.						comply with the measures established by the cognizant TO.
Subpart G-Posting and Labeling 835.601 General Requirements 601(a) Except as otherwise provided in this subpart, postings and labels required by this subpart shall include the standard radiation warning trefoil in black or magenta imposed upon a yellow background.	NV/YMP RCM 231.2.02 and.03. Signs shall contain the standard radiation symbol ("trefoil") colored magenta or black on a yellow background. Lettering shall be either magenta or black. NV/YMP RCM 412.3.01 and .02. Labels shall have a yellow background with a magenta or black standard	NV/YMP RCM 231.2.02 and.03. Signs shall contain the standard radiation symbol ("trefoil") colored magenta or black on a yellow background. Lettering shall be either magenta or black. NV/YMP RCM 412.3.01 and .02. Labels shall have a yellow background with a magenta or black standard	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	Not applicable to DRI. The RSPC provides the appropriate signage and labels.	Posting and labeling are beyond the scope of WSI/NV radiological control responsibilities. The RSPC provides appropriate signs and labels.

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	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference
	radiation symbol. Lettering shall be magenta or black.	radiation symbol. Lettering shall be magenta or black.						
601(b) Signs required by this subpart shall be clearly and conspicuously posted and may include radiological protection instructions.	NV/YMP RCM 231.3.01. Signs shall be conspicuously posted, clearly worded, and may include radiological control instructions, where appropriate.	NV/YMP RCM 231.3.01. Signs shall be conspicuously posted, clearly worded, and may include radiological control instructions, where appropriate.	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	This service is provided to DRI by the RSPC.	Posting and labeling are beyond the scope of WSI/NV radiological control responsibilities. The RSPC provides appropriate signs and labels.
601(c) The posting and labeling requirements in this subpart may be modified to reflect the special considerations of DOE activities conducted at private residences or businesses. Such modifications shall provide the same level of protection to individuals as the existing provisions in this subpart.	NV/YMP RCM 231.10. The posting and labeling requirements in this Manual may be modified to reflect the special considerations of DOE activities conducted at private residences or businesses. Such modifications	NV/YMP RCM 231.10. The posting and labeling requirements in this Manual may be modified to reflect the special considerations of DOE activities conducted at private residences or businesses. Such modifications	Operations conducted by LLNL at the NTS do not include activities at private residences or businesses.	This is outside the scope of the LANL/NTS Radiological Control Program. Operations conducted by LANL at the NTS do not include activities at private residences or businesses.	SNL-NV is not involved in any remediation activities at private residences nor are there SNL facilities, operations or processes at private residences or businesses.	Same as Column 3	Not applicable to DRI as operations conducted by DRI at the NTS do not include activities at private residences or businesses.	Posting and labeling are beyond the scope of WSI/NV radiological control responsibilities. The RSPC provides appropriate signs and labels.

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	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference
	shall provide the same level of protection to individuals as the existing provisions in this manual.	shall provide the same level of protection to individuals as the existing provisions in this manual.						
835.602 Controlled Areas. 602(a) Each access point to a controlled area (as defined in §835.2) shall be posted whenever radiological areas or radioactive material areas exist in the area. Individuals who enter only controlled areas without entering radiological areas or radioactive material areas are not expected to receive a total effective dose of more than 0.1 rem (0.001 Sv) in a year.	NV/YMP RCM 232.1. Each access point to a Controlled Area shall be posted. When any other radiological warning signs are present, the Controlled Area sign is not required. Individuals who enter only the Controlled Area without entering radiological areas or RMAs are not expected to receive a TEDE of more than 0.1 rem (0.001 sievert) in a year.	Revise: NV/YMP RCM 232.1. Each access point to a Controlled Area shall be posted. When any other radiological warning signs are present, the Controlled Area sign is not required. Individuals who enter only the Controlled Area without entering radiological areas or RMAs are not expected to receive a TED of more than 0.1 rem (0.001 sievert) in a year.	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	Not a DRI activity. Posting of access points to a controlled area is a service provided to DRI by the RSPC. If access is required DRI will comply with controls established by the cognizant TO.	Posting of controlled areas is beyond the scope of WSI/NV radiological control responsibilities. The RSPC or TO who has radiological control responsibilities for the controlled area is responsible for ensuring that the requirements of this section are met. If access is required, WSI/NV personnel will comply with all controls established by the RSPC or TO.

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	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference
602(b) Signs used for this purpose may be selected by the contractor to avoid conflict with local security requirements.	NV/YMP RCM 232.2. As a minimum the Controlled Area posting shall contain the following wording: "CONTROLLED AREA. THIS AREA IS CONTROLLED FOR THE PURPOSE OF LIMITING ACCESS TO RADIATION OR RADIOACTIVITY . GENERAL EMPLOYEE RADIOLOGICAL TRAINING (GERT) IS REQUIRED FOR ACCESS."	NV/YMP RCM 232.2. As a minimum the Controlled Area posting shall contain the following wording: "CONTROLLED AREA. THIS AREA IS CONTROLLED FOR THE PURPOSE OF LIMITING ACCESS TO RADIATION OR RADIOACTIVITY . GENERAL EMPLOYEE RADIOLOGICAL TRAINING (GERT) IS REQUIRED FOR ACCESS."	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	Not a DRI activity. Required signage is provided to DRI by the RSPC.	By written agreement, the RSPC provides this service.
835.603 Radiological Areas and Radioactive Material Areas. Each access point to radiological areas and radioactive material areas (as defined in	NV/YMP RCM 231.2.01. Each access point to a radiological area shall be posted according to Tables 2-3 and 2-4.	NV/YMP RCM 231.2.01. Each access point to a radiological area shall be posted according to Tables 2-3 and 2-4.	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	Not applicable. DRI does not have radiological areas, but will comply with any requirements established by the postings	Not a WSI/NV activity. WSI/NV does not control radiological areas but will comply with the requirements established by

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	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference
§835.2) shall be posted with conspicuous signs bearing the wording provided in this section.	NV/YMP RCM 236.1.01. Accessible areas where items or containers of radioactive material in quantities exceeding the values provided in Appendix 4A are used, handled, or stored shall be posted "CAUTION, RADIOACTIVE MATERIAL."	NV/YMP RCM 236.1.01. Accessible areas where items or containers of radioactive material in quantities exceeding the values provided in Appendix 4A are used, handled, or stored shall be posted "CAUTION, RADIOACTIVE MATERIAL."					provided by the RSPC or cognizant TO.	the RSPC.
603(a) Radiation Area. The words "Caution, Radiation Area" shall be posted at each radiation area.	NV/YMP RCM Table 2-3, Item: 1. Radiation Area, >0.005 rem in one hour at 30 cm, "CAUTION, RADIATION AREA."	NV/YMP RCM Table 2-3, Item: 1. Radiation Area, >0.005 rem in one hour at 30 cm, "CAUTION, RADIATION AREA."	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	Not applicable. DRI does not have radiological areas but will comply with any requirements established by the postings provided by the RSPC or cognizant TO.	Not a WSI/NV activity. WSI/NV does not control radiological areas.
603(b) High Radiation Area. The words "Caution, High	NV/YMP RCM Table 2-3 Item: 2. High Radiation	NV/YMP RCM Table 2-3 Item: 2. High Radiation	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	Not applicable. DRI does not have radiological	Not a WSI/NV activity. WSI/NV does not control

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	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference
Radiation Area" or "Danger, High Radiation Area" shall be posted at each high radiation area.	Area, >0.1 rem in one hour at 30 cm, "CAUTION, HIGH RADIATION AREA" or "DANGER, HIGH RADIATION AREA."	Area, >0.1 rem in one hour at 30 cm, "CAUTION, HIGH RADIATION AREA" or "DANGER, HIGH RADIATION AREA."					areas but will comply with any requirements established by the postings provided by the RSPC or cognizant TO.	radiological areas.
603(c) Very High Radiation Area. The words "Grave Danger, Very High Radiation Area" shall be posted at each very high radiation area.	NV/YMP RCM Table 2-3, Item: 3. Very High Radiation Area, >500 rad in one hour at 1 meter. "GRAVE DANGER, VERY HIGH RADIATION AREA."	NV/YMP RCM Table 2-3, Item: 3. Very High Radiation Area, >500 rad in one hour at 1 meter. "GRAVE DANGER, VERY HIGH RADIATION AREA."	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	Not a DRI activity. DRI does not have radiological areas and does not conduct work in very high radiation areas	Not a WSI/NV activity. WSI/NV does not control radiological areas.
603(d) Airborne Radioactivity Area. The words "Caution, Airborne Radioactivity Area" or "Danger, Airborne Radioactivity Area" shall be posted at each airborne radioactivity area.	NV/YMP RCM Table 2-4, Item: 3. Airborne Radioactivity. Concentrations ($\mu\text{Ci/ml}$) > any DAC value or potential for intakes exceeding 12 DAC hours/week without respiratory	NV/YMP RCM Table 2-4, Item: 3. Airborne Radioactivity. Concentrations ($\mu\text{Ci/ml}$) > any DAC value or potential for intakes exceeding 12 DAC hours/week without respiratory	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	Not a DRI activity. DRI does not have radiological areas and does not conduct work in airborne radioactivity areas.	Not a WSI/NV activity. WSI/NV does not control radiological areas.

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	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference
	protection. "CAUTION, AIRBORNE RADIOACTIVITY AREA" or "DANGER, AIRBORNE RADIOACTIVITY AREA."	protection. "CAUTION, AIRBORNE RADIOACTIVITY AREA" or "DANGER, AIRBORNE RADIOACTIVITY AREA."						
603(e) Contamination Area. The words "Caution, Contamination Area" shall be posted at each contamination area.	NV/YMP RCM Table 2-4, Item: 1. Contamination. Removable contamination levels >1 time but ≤100 times Table 2-2 values, "CAUTION, CONTAMINATION AREA."	NV/YMP RCM Table 2-4, Item: 1. Contamination. Removable contamination levels >1 time but ≤100 times Table 2-2 values, "CAUTION, CONTAMINATION AREA."	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	Not a DRI activity. This service is provided to DRI by the RSPC on the NTS and as requested at off-site locations.	Not a WSI/NV activity. WSI/NV does not control radiological areas.
603(f) High Contamination Area. The words "Caution, High Contamination Area" or "Danger, High Contamination Area" shall be posted at each high contamination area.	NV/YMP RCM Table 2-4, Item: 2. High Contamination. Removable contamination levels >100 times Table 2-2 values. "DANGER, HIGH CONTAMINATION	NV/YMP RCM Table 2-4, Item: 2. High Contamination. Removable contamination levels >100 times Table 2-2 values. "DANGER, HIGH CONTAMINATION	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	Not a DRI activity. This service is provided to DRI by the RSPC on the NTS and as requested at off-site locations.	Not a WSI/NV activity. WSI/NV does not control radiological areas.

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	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference
	AREA" or "CAUTION, HIGH CONTAMINATION AREA."	AREA" or "CAUTION, HIGH CONTAMINATION AREA."						
603(g) Radioactive Material Area. The words "Caution, Radioactive Material(s)" shall be posted at each radioactive material area.	NV/YMP RCM 236.1.01. Accessible areas where items or containers of radioactive material in quantities exceeding the values provided in Appendix 4A are used, handled, or stored shall be posted "CAUTION, RADIOACTIVE MATERIAL."	NV/YMP RCM 236.1.01. Accessible areas where items or containers of radioactive material in quantities exceeding the values provided in Appendix 4A are used, handled, or stored shall be posted "CAUTION, RADIOACTIVE MATERIAL."	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	UNR RSM Policy IV: Handling Policies, Section F.1, Posting of Radiation Areas (speaks to RMAs). Required signage for materials obtained under the UNR Radioactive Material License #16-13-0003-07 is provided to DRI by the UNR RSO.	Not a WSI/NV activity. WSI/NV does not control radioactive material areas.
835.604 Exceptions to Posting Requirements. 604(a) Areas may be excepted from the posting requirements of §835.603 for periods of less than 8 continuous hours	NV/YMP RCM 231.11.a. Exceptions to posting requirements: a. Areas may be excepted from the posting requirements of 10 CFR 835.603	NV/YMP RCM 231.11.a. Exceptions to posting requirements: a. Areas may be excepted from the posting requirements of 10 CFR 835.603	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	Not a WSI/NV activity. WSI/NV does not control radiological areas but will comply with the requirements established by the RSPC.

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	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference
when placed under continuous observation and control of an individual knowledgeable of, and empowered to implement, required access and exposure control measures.	for periods of less than 8 continuous hours when placed under continuous observation and control of an individual knowledgeable of, and empowered to implement, required access- and exposure - control measures.	for periods of less than 8 continuous hours when placed under continuous observation and control of an individual knowledgeable of, and empowered to implement, required access- and exposure - control measures.						
604(b) Areas may be excepted from the radioactive material area posting requirements of §835.603 (g) when: (1) Posted in accordance with §835.603 (a) through (f); or (2) Each item or container of radioactive material is labeled in accordance with this subpart such that individuals entering the area are	NV/YMP RCM 231.11.b. Exceptions to posting requirements: b. Areas may be excepted from the RMA posting requirements of 10 CFR 835.603(g) when: (1) Posted according to 10 CFR 835.603(a) through (f); or	NV/YMP RCM 231.11.b. Exceptions to posting requirements: b. Areas may be excepted from the RMA posting requirements of 10 CFR 835.603(g) when: (1) Posted according to 10 CFR 835.603(a) through (f); or	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	Not a WSI/NV activity. WSI/NV does not control radioactive material areas.

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	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference
made aware of the hazard; or (3) The radioactive material of concern consists solely of structures or installed components which have been activated (i.e., such as by being exposed to neutron radiation or particles produced in an accelerator).	(2) Each item or container of radioactive material is labeled according to 10 CFR 835.605 such that individuals entering the area are made aware of the hazard; or (3) The radioactive material of concern consists solely of structures or installed components that have been activated (i.e., such as being exposed to neutron radiation or particles produced in an accelerator).	(2) Each item or container of radioactive material is labeled according to 10 CFR 835.605 such that individuals entering the area are made aware of the hazard; or (3) The radioactive material of concern consists solely of structures or installed components that have been activated (i.e., such as being exposed to neutron radiation or particles produced in an accelerator).						
604(c) Areas containing only packages received from radioactive material transportation	NV/YMP RCM 231.11.c. Exceptions to posting requirements:	NV/YMP RCM 231.11.c. Exceptions to posting requirements:	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	Not a WSI/NV activity. WSI/NV does not control radiological areas.

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	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference
labeled and in non-degraded condition need not be posted in accordance with §835.603 until the packages are monitored in accordance with §835.405.	c. Areas containing only packages received from radioactive material transportation labeled and in non-degraded condition need not be posted according to 10 CFR 835.603 until the packages are monitored according to 10 CFR 835.405.	c. Areas containing only packages received from radioactive material transportation labeled and in non-degraded condition need not be posted according to 10 CFR 835.603 until the packages are monitored according to 10 CFR 835.405.						
835.605 Labeling Items and Containers. Except as provided at §835.606, each item or container of radioactive material shall bear a durable, clearly visible label bearing the standard radiation warning trefoil and the words "Caution, Radioactive Material" or "Danger, Radioactive Material."	NV/YMP RCM 412.1. Except as provided in Article 412.2, each item or container of radioactive material shall bear a durable, clearly visible label bearing the standard radiation warning trefoil and the words "Caution,	NV/YMP RCM 412.1. Except as provided in Article 412.2, each item or container of radioactive material shall bear a durable, clearly visible label bearing the standard radiation warning trefoil and the words "Caution,	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	Not applicable to WSI/NV. The RSPC or TO who has radiological control responsibility for an item or container of radiological material is responsible for ensuring that the requirements of this section are met. WSI/NV

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	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference
The label shall also provide sufficient information to permit individuals handling, using, or working in the vicinity of the items or containers, to take precautions to avoid or control exposures.	Radioactive Material" or Danger, Radioactive Material." The label shall also provide sufficient information to permit individuals handling, using, or working in the vicinity of the items or containers to take precautions to avoid or control exposures.	Radioactive Material" or Danger, Radioactive Material." The label shall also provide sufficient information to permit individuals handling, using, or working in the vicinity of the items or containers to take precautions to avoid or control exposures.						personnel will comply with all requirements established.
835.606 Exceptions to Labeling Requirements. 606(a) Items and containers may be excepted from the radioactive material labeling requirements of §835.605 when: (1) Used, handled, or stored in areas posted and controlled in accordance with this subpart and sufficient	NV/YMP RCM 411.2. Except for accountable sealed radioactive sources, according to Appendix 4A, radioactive material located within Controlled Areas, RMAs, or radiological areas does not require specific	NV/YMP RCM 411.2. Except for accountable sealed radioactive sources, according to Appendix 4A, radioactive material located within Controlled Areas, RMAs, or radiological areas does not require specific	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	Not applicable to WSI/NV. The RSPC or TO who has radiological control responsibility for an item or container of radiological material is responsible for ensuring that the requirements of this section are met. WSI/NV

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	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference
information is provided to permit individuals to take precautions to avoid or control exposures; or (2) The quantity of radioactive material is less than one tenth of the values specified in appendix E of this part and less than 0.1 Ci; or (3) Packaged, labeled, and marked in accordance with the regulations of the Department of Transportation or DOE Orders governing radioactive material transportation; or (4) Inaccessible, or accessible only to individuals authorized to handle or use them, or to work in the vicinity; or (5) Installed in manufacturing, process, or other equipment, such as reactor components, piping, and tanks; or	labeling or packaging. NV/YMP RCM 412.2.b., d., f., g., and h. The following materials are not subject to labeling requirements: b. Items packaged, labeled, and marked according to the regulations of the U.S. Department of Transportation (DOT) or DOE Orders governing radioactive material transportation. d. The quantity of radioactive material is less than one tenth of the values specified in Appendix 4A. f. Inaccessible or accessible only	labeling or packaging. Revise: NV/YMP RCM 412.2.b., d., f., g., and h. The following materials are not subject to labeling requirements: b. Items packaged, labeled, and marked according to the regulations of the U.S. Department of Transportation (DOT) or DOE Orders governing radioactive material transportation. d. The quantity of radioactive material is less than one tenth of the values specified in Appendix 4A and less than 0.1 Ci. f. Inaccessible or						personnel will comply with all requirements established.

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	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference
(6) The radioactive material consists solely of nuclear weapons or their components.	to individuals authorized to handle or use them or to work in the vicinity of the material. g. Installed in manufacturing, processing, or other equipment, such as reactor components, piping, and tanks. h. The radioactive material consists solely of nuclear weapons or their components.	accessible only to individuals authorized to handle or use them or to work in the vicinity of the material. g. Installed in manufacturing, processing, or other equipment, such as reactor components, piping, and tanks. h. The radioactive material consists solely of nuclear weapons or their components.						
606(b) Radioactive material labels applied to sealed radioactive sources may be excepted from the color specifications of §835.601(a).	NV/YMP RCM 412.3.03. Radioactive material labels applied to sealed radioactive sources may be excepted from the color specifications.	NV/YMP RCM 412.3.03. Radioactive material labels applied to sealed radioactive sources may be excepted from the color specifications.	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	Not applicable to WSI/NV. WSI/NV is not a sealed radioactive source custodian.
Subpart H-Records 835.701 General	NV/YMP RCM 711.01.	NV/YMP RCM 711.01.	Same as Column 3	Same as Column 3	All records pertaining to SNL	Same as column 3 and Records	Radiological records for DRI	Records generated by

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	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference
Provisions 701(a) Records shall be maintained to document compliance with this part and with radiation protection programs required by §835.101.	Radiological control records shall be maintained as necessary to document compliance with the requirements of 10 CFR 835. NV/YMP RCM 712.1.01. A radiological records management program shall be established by each NNSA/NSO and YMORD TO.	Radiological control records shall be maintained as necessary to document compliance with the requirements of 10 CFR 835. Revise: NV/YMP RCM 712.1.01. A radiological records management program shall be established by each NNSA/NSO and OCRWM TO.			activities at NTS are maintained and archived by the RSPC.	generated by the RSPC for services provided to SNJV are maintained by the RSPC.	generated by the RSPC are maintained by the RSPC. Any copies of radiological records received by DRI from the RSPC are kept on file in the DRI EH&S Office for a minimum of three years, after which medical and exposure records are sent for long- term storage to the Business Center North Risk Management per Nevada Systems of Higher Education policy.	WSI/NV will be maintained by WSI/NV. By written agreement, records generated by the RSPC will be maintained by the RSPC.
701(b) Unless otherwise specified in this subpart, records shall be retained until final disposition is authorized by DOE.	NV/YMP RCM 711.04. Unless otherwise specified in this section, records shall be retained until final disposition is authorized by	Revise: NV/YMP RCM 711.04. Unless otherwise specified in this section, records shall be retained until final disposition is authorized by	Same as Column 3	Same as Column 3	All records pertaining to SNL activities at NTS are maintained and archived by the RSPC.	Same as Column 3 and Records generated by the RSPC for services provided to SNJV are maintained by the RSPC.	Radiological records generated by the RSPC for DRI are maintained and archived by the RSPC.	By written agreement, records generated by the RSPC will be maintained by the RSPC.

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	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference

	NNSA/NSO or YMORD TO.	NNSA/NSO or OCRWM TO.						
835.702 Individual Monitoring Records 702(a) Except as authorized by § 835.702(b), records shall be maintained to document doses received by all individuals for whom monitoring was conducted and to document doses received during planned special exposures, unplanned doses exceeding the monitoring thresholds of § 835.402, and authorized emergency exposures.	NV/YMP RCM 722.1.01. Records of doses received by all individuals for whom individual monitoring was performed shall be recorded in the individual's occupational dose record and shall be maintained by the RSPC.	Revise: NV/YMP RCM 722.1.01. Except as specified in 722.10 and 722.11, records of doses received by all individuals for whom individual monitoring was conducted shall be recorded in the individual's occupational dose record and shall be maintained by the RSPC.	By written agreement, the LLNL Hazard Control Personnel Dosimetry Team records and maintains LLNL employee occupational dose provided by the NTS RSPC.	This is outside the scope of the LANL/NTS Radiological Control Program. The LANL RP-2 Radiation Information Management Team records and maintains LANL employee dose assessments provided by the NTS RSPC.	Same as Column 3 and Primary dose records for SNL personnel at NTS are maintained and archived by RSPC. Doses received are reported by RSPC to SNL-Albuquerque Dosimetry Records Organization.	Same as Column 3 and NV/YMP RCM 141.3.e. The RSPC shall provide the following: e. External and internal dosimetry services. Records generated by the RSPC for services provided to SNJV are maintained by the RSPC.	Dosimetry records generated by RSPC are maintained by the RSPC. Cross reference response to 835.101(c) of this table.	By written agreement, the RSPC provides dosimetry services to WSI/NV. Records generated by the RSPC will be maintained by the RSPC.
702(b) Recording of the non-uniform equivalent dose to the skin is not required if the dose is less than 2 percent of the limit specified for the skin at § 835.202(a) (4). Recording of internal dose (committed	NV/YMP RCM 722.1.01. Records of doses received by all individuals for whom individual monitoring was performed shall be recorded in	NV/YMP RCM 722.1.01. Records of doses received by all individuals for whom individual monitoring was performed shall be recorded in	By written agreement, the LLNL Hazard Control Personnel Dosimetry Team records and maintains LLNL employee occupational	This is outside the scope of the LANL/NTS Radiological Control Program. The LANL RP-2 Radiation Information Management Team records	Primary dose records for SNL personnel at NTS maintained and archived by RSPC. Doses received reported by RSPC to SNL-Albuquerque	NV/YMP RCM 141.3.e. The RSPC shall provide the following: (e) External and internal dosimetry services.	Dosimetry records generated by RSPC are maintained by the RSPC. Cross reference response to 835.101(c) of this table.	By written agreement, the RSPC provides dosimetry services to WSI/NV and maintains individual monitoring records.

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effective dose or committed equivalent dose) is not required for any monitoring result estimated to correspond to an individual receiving less than 0.01 rem (0.1 mSv) committed effective dose. The bioassay or air monitoring result used to make the estimate shall be maintained in accordance with § 835.703(b) and the unrecorded internal dose estimated for any individual in a year shall not exceed the applicable monitoring threshold at § 835.402(c).	the individual's occupational dose record and shall be maintained by the RSPC. NV/YMP RCM 722.10. Recording of the non-uniform shallow dose equivalent to the skin is not required if the dose is less than 2 percent of the limit specified for the skin in Table 2-1.	the individual's occupational dose record and shall be maintained by the RSPC. NV/YMP RCM 722.10. Recording of the non-uniform shallow dose equivalent to the skin is not required if the dose is less than 2 percent of the limit specified for the skin in Table 2-1. Add: NV/YMP RCM 722.11 Recording of internal dose (committed effective dose or committed equivalent dose) is not required for any monitoring result estimated to	dose provided by the NTS RSPC.	and maintains LANL employee dose assessments provided by the NTS RSPC.	Dosimetry Records Organization.	Records generated by the RSPC for services provided to SNJV are maintained by the RSPC.		
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		correspond to an individual receiving less than 0.01 rem committed effective dose. The bioassay or air monitoring result used to make the estimate shall be maintained in accordance with § 835.703(b) and the unrecorded internal dose estimated for any individual in a year shall not exceed the applicable monitoring threshold in Article 521.1.						
702(c) The records required by this section shall: (1) Be sufficient to evaluate compliance with subpart C of this part; (2) Be sufficient to provide dose	NV/YMP RCM 712.1.02. This program shall ensure that auditable records and reports are controlled through the stages of	NV/YMP RCM 712.1.02. This program shall ensure that auditable records and reports are controlled through the stages of	By written agreement, the LLNL Hazard Control Personnel Dosimetry Team records and maintains LLNL employee	This is outside the scope of the LANL/NTS Radiological Control Program. The LANL RP-2 Radiation Information Management	Primary dose records for SNL personnel at NTS maintained and archived by RSPC. Doses received reported by RSPC to SNL-	NV/YMP RCM 141.3.e. The RSPC shall provide the following: (e) External and internal dosimetry services.	Dosimetry service is provided by the RSPC, which is responsible for maintaining a sufficient staff of site-trained radiological	By written agreement, the RSPC provides dosimetry services to WSI/NV and maintains individual monitoring

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<p>information necessary to complete reports required by subpart I of this part; (3) Include the results of monitoring used to assess the following quantities for external dose received during the year: (i) The effective dose from external sources of radiation (equivalent dose to the whole body may be used as effective dose for external exposure); (ii) The equivalent dose to the lens of the eye; (iii) The equivalent dose to the skin; and (iv) The equivalent dose to the extremities. (4) Include the following information for internal dose resulting from intakes received during the year: (i) Committed effective dose;</p>	<p>creation, distribution, use, arrangement, storage, retrieval, media conversion (if applicable), and disposition.</p> <p>NV/YMP RCM 722.1.02. These records shall be sufficient to evaluate compliance with all applicable dose limits and monitoring and reporting requirements.</p> <p>NV/YMP RCM 722.4.a-d. The records shall include the following quantities for external dose received during the year: a. The effective dose equivalent from external</p>	<p>creation, distribution, use, arrangement, storage, retrieval, media conversion (if applicable), and disposition.</p> <p>NV/YMP RCM 722.1.02. These records shall be sufficient to evaluate compliance with all applicable dose limits and monitoring and reporting requirements.</p> <p>Revise: NV/YMP RCM 722.4.a-d. The records shall include the following quantities for external dose received during the year: a. The effective dose from</p>	<p>occupational dose provided by the NTS RSPC.</p>	<p>Team records and maintains LANL employee dose assessments provided by the NTS RSPC.</p>	<p>Albuquerque Dosimetry Records Organization.</p> <p>For internal doses received by SNL personnel at NTS, only the assigned doses are reported to SNL-Albuquerque Dosimetry Records Organization. All records associated with whole body counts, specimen analysis results, etc. maintained by RSPC.</p> <p>For SNL personnel primary dose records are maintained by Dosimetry Records</p>	<p>Records generated by the RSPC for services provided to SNJV are maintained by the RSPC.</p>	<p>control personnel to accommodate the needs of the TOs (NV/YMP RCM 141.2 and 3).</p> <p>Primary dose records for DRI personnel on NNSA/NSO projects are maintained and archived by RSPC. Doses received are reported by RSPC to DRI. Cross reference response to 835.101(c) of this table.</p>	<p>records.</p> <p>By written agreement, dosimetry records are generated and maintained by the RSPC.</p>

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<p>(ii) Committed equivalent dose to any organ or tissue of concern; and</p> <p>(iii) Identity of radionuclides.</p> <p>(5) Include the following quantities for the summation of the external and internal dose:</p> <p>(i) Total effective dose in a year;</p> <p>(ii) For any organ or tissue assigned an internal dose during the year, the sum of the equivalent dose to the whole body from external exposures and the committed equivalent dose to that organ or tissue; and</p> <p>(iii) Cumulative total effective dose.</p> <p>(6) Include the equivalent dose to the embryo/fetus of a declared pregnant worker.</p>	<p>sources of radiation (deep dose equivalent may be used as effective dose equivalent for external exposure).</p> <p>b. The lens of the eye dose equivalent.</p> <p>c. The shallow dose equivalent to the skin.</p> <p>d. The shallow dose equivalent to the extremities.</p> <p>NV/YMP RCM 722.5. a-c. Internal dose records shall include the following:</p> <p>a. Applicable whole body and lung counting results (including chest wall thickness measurements where</p>	<p>external sources of radiation</p> <p>b. The equivalent dose to the lens of the eye</p> <p>c. The equivalent dose to the skin</p> <p>d. The equivalent dose to the extremities</p> <p>Revise: NV/YMP RCM 722.5. a-c. Internal dose records shall include the following information for internal dose resulting from intakes received during the year:</p> <p>a. Committed effective dose</p> <p>b. Committed equivalent dose to any organ or tissue of concern</p> <p>c. Identity of radionuclides</p> <p>Revise: NV/YMP RCM 722.6. a-c.</p>			Organization in Albuquerque.			

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	<p>applicable).</p> <p>b. Applicable urine, fecal, and specimen analysis results, including estimated intake and identity of radionuclides.</p> <p>c. Dose assessment, as required.</p> <p>NV/YMP RCM 722.6. a-c. Include the following quantities for the summation of the external and internal dose:</p> <p>a. TEDE in a year.</p> <p>b. For any organ or tissue assigned an internal dose during the year, the sum of the deep dose equivalent from external exposure and</p>	<p>Include the following quantities for the summation of the external and internal dose:</p> <p>a. TED in a year</p> <p>b. For any organ or tissue assigned an internal dose during the year, the sum of the equivalent dose to the whole body from external exposures and the committed equivalent dose to that organ or tissue</p> <p>c. Cumulative TED</p> <p>Revise: NV/YMP RCM 722.7. Include the equivalent dose to the embryo/fetus of a declared pregnant worker.</p>						

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	the committed dose equivalent to that organ or tissue. c. Cumulative TEDE. NV/YMP RCM 722.7. Include the dose equivalent to the embryo/fetus of a declared pregnant worker.							
702(d) Documentation of all occupational doses received during the current year, except for doses resulting from planned special exposures conducted in compliance with §835.204 and emergency exposures authorized in accordance with §835.1302(d), shall be obtained to demonstrate compliance with §835.202(a). If complete records	NV/YMP RCM 721.1.01-02. Documentation of all occupational doses received during the current year, except for doses resulting from planned special exposures and emergency exposures, shall be obtained to demonstrate compliance with occupational dose limits for	NV/YMP RCM 721.1.01-02. Documentation of all occupational doses received during the current year, except for doses resulting from planned special exposures and emergency exposures, shall be obtained to demonstrate compliance with occupational dose limits for	By written agreement, the LLNL Hazard Control Personnel Dosimetry Team records and maintains LLNL employee occupational dose provided by the NTS RSPC.	This is outside the scope of the LANL/NTS Radiological Control Program. The LANL RP-2 Radiation Information Management Team records and maintains LANL employee dose assessments provided by the NTS RSPC.	NV/YMP RCM 722.1.02. These records shall be sufficient to evaluate compliance with all applicable dose limits and monitoring and reporting requirements. For SNL personnel primary dose records are maintained by Dosimetry Records	NV/YMP RCM 141.3.e. The RSPC shall provide the following: e. External and internal dosimetry services. Records generated by the RSPC for services provided to SNJV are maintained by the RSPC.	Primary dose records for DRI personnel on NNSA/NSO projects are maintained and archived by RSPC. Doses received are reported by RSPC to DRI. Cross reference response to 835.101(c) of this table.	By written agreement, the RSPC provides dosimetry services to WSI/NV and maintains individual monitoring records.

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documenting previous occupational dose during the year cannot be obtained, a written estimate signed by the individual may be accepted to demonstrate compliance.	general employees. If complete records documenting previous occupational dose during the year cannot be obtained, a written estimate signed by the individual may be accepted to demonstrate compliance.	general employees. If complete records documenting previous occupational dose during the year cannot be obtained, a written estimate signed by the individual may be accepted to demonstrate compliance.			Organization in Albuquerque.			
702(e) For radiological workers whose occupational dose is monitored in accordance with §835.402, reasonable efforts shall be made to obtain complete records of prior years occupational internal and external dose.	NV/YMP RCM 721.2. Reasonable efforts shall be made to obtain complete records of previous years' occupational internal and external doses for radiological workers whose occupational dose is monitored according to 10 CFR 835.402.	NV/YMP RCM 721.2. Reasonable efforts shall be made to obtain complete records of previous years' occupational internal and external doses for radiological workers whose occupational dose is monitored according to 10 CFR 835.402.	By written agreement, the LLNL Hazard Control Personnel Dosimetry Team records and maintains LLNL employee occupational dose provided by the NTS RSPC.	This is outside the scope of the LANL/NTS Radiological Control Program. The LANL RP-2 Radiation Information Management Team records and maintains LANL employee dose assessments provided by the NTS RSPC.	For SNL personnel primary dose records are maintained by Dosimetry Records Organization in Albuquerque.	NV/YMP RCM 141.3.e. The RSPC shall provide the following: e. External and internal dosimetry services. Records generated by the RSPC for services provided to SNJV are maintained by the RSPC.	Cross reference NV/YMP RCM 721 and UNR RSM Procedure XIII: Personnel Monitoring, Section 3, Records. B. Records of Prior Exposure. Dosimetry services are provided to DRI by the RSPC. Records from these services are maintained	By written agreement, the RSPC provides dosimetry services to WSI/NV and maintains individual monitoring records.

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							by the RSPC.	
702(f) The records specified in this section that are identified with a specific individual shall be readily available to that individual.	NV/YMP RCM 781.1.b. Detailed information concerning an individual's exposure shall be made available to that individual, upon request, consistent with the Privacy Act of 1974, which contains requirements to protect the privacy of individual records.	NV/YMP RCM 781.1.b. Detailed information concerning an individual's exposure shall be made available to that individual, upon request, consistent with the Privacy Act of 1974, which contains requirements to protect the privacy of individual records.	By written agreement, the LLNL Hazard Control Personnel Dosimetry Team records and maintains LLNL employee occupational dose provided by the NTS RSPC.	This is outside the scope of the LANL/NTS Radiological Control Program. The LANL RP-2 Radiation Information Management Team records and maintains LANL employee dose assessments provided by the NTS RSPC.	For SNL personnel primary dose records are maintained by Dosimetry Records Organization in Albuquerque.	NV/YMP RCM 141.3.e. The RSPC shall provide the following: (e) External and internal dosimetry services. Records generated by the RSPC for services provided to SNJV are maintained by the RSPC.	Same as Column 3 DRI distributes individual records received from the RSPC as required by NAC 459.786 and UNR RCM Procedure XIII: Personnel Monitoring, Section 3, Records, A. Personnel Exposure Records.	By written agreement, the RSPC provides dosimetry services and maintains individual monitoring records.
702(g) Data necessary for future verification or reassessment of the recorded doses shall be recorded.	NV/YMP RCM 722.3.03. Procedures, data, and supporting information needed to reconfirm a person's dose at a later date shall be maintained.	NV/YMP RCM 722.3.03. Procedures, data, and supporting information needed to reconfirm a person's dose at a later date shall be maintained.	By written agreement, the LLNL Hazard Control Personnel Dosimetry Team records and maintains LLNL employee occupational dose provided by the NTS RSPC.	This is outside the scope of the LANL/NTS Radiological Control Program. The LANL RP-2 Radiation Information Management Team records and maintains LANL employee	These data are maintained by the RSPC for SNL personnel.	NV/YMP RCM 141.3.e. The RSPC shall provide the following: (e) External and internal dosimetry services. Records generated by the	Data are maintained by the RSPC for DRI personnel. DRI maintains any copies as required by 29 CFR 1910.1020.	By written agreement, the RSPC provides dosimetry services to WSI/NV and maintains individual monitoring records.

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				dose assessments provided by the NTS RSPC.		RSPC for services provided to SNJV are maintained by the RSPC.		
702(h) All records required by this section shall be transferred to the DOE upon cessation of activities at the site that could cause exposure to individuals.	<p>NV/YMP RCM 711.03. Upon cessation of activities that could result in the occupational exposure of individuals, all required records shall be transferred to NNSA/NSO.</p> <p>NV/YMP RCM 712.3. DOE G 1324.5B, "Guide for DOE 1324.5B Records Management," provides implementing instructions, records inventory requirements, disposition schedules, and provisions for</p>	<p>NV/YMP RCM 711.03. Upon cessation of activities that could result in the occupational exposure of individuals, all required records shall be transferred to NNSA/NSO.</p> <p>NV/YMP RCM 712.3. DOE G 1324.5B, "Guide for DOE 1324.5B Records Management," provides implementing instructions, records inventory requirements, disposition schedules, and provisions for</p>	By written agreement, the LLNL Hazard Control Personnel Dosimetry Team records and maintains LLNL employee occupational dose provided by the NTS RSPC.	This is outside the scope of the LANL/NTS Radiological Control Program. The LANL RP-2 Radiation Information Management Team records and maintains LANL employee dose assessments provided by the NTS RSPC.	For SNL personnel primary dose records are maintained by Dosimetry Records Organization in Albuquerque.	RCM 141.3.e. The RSPC shall provide the following: (e) External and internal dosimetry services. Records generated by the RSPC for services provided to SNJV are maintained by the RSPC.	Dosimetry services are provided to DRI by the RSPC and records generated from these services are maintained by the RSPC, therefore the RSPC would be responsible for record transfer.	By written agreement, the RSPC provides dosimetry services to WSI/NV and maintains individual monitoring records.

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	transferring records.	transferring records.						
835.703 Other Monitoring Records. The following information shall be documented and maintained: 703(a) Results of monitoring for radiation and radioactive material as required by subpart E and L of this part, except for monitoring required by §835.1102(d);	NV/YMP RCM 751.1.01. Radiological control programs require the performance of radiation, airborne radioactivity, and contamination surveys to determine existing conditions in a given location. NV/YMP RCM 751.2. a and e. Records shall be maintained to document the following information: a. Results of monitoring and surveys for radiation and radioactive materials. e. Results of surveys of	NV/YMP RCM 751.1.01. Radiological control programs require the performance of radiation, airborne radioactivity, and contamination surveys to determine existing conditions in a given location. NV/YMP RCM 751.2. a and e. Records shall be maintained to document the following information: a. Results of monitoring and surveys for radiation and radioactive materials. e. Results of surveys of	The LLNL Radiological Control Program maintains results of monitoring for radiation and radioactive material as required by 10 CFR 835 Subparts E and L, except for monitoring required by 835.1102(d).	Results of documented radiological surveys are provided to and maintained by the NTS RSPC. This is outside the scope of the LANL/NTS Radiological Control Program... The NTS RSPC provides trained and qualified Radiological Control Technicians to perform and document radiological surveys per NTS RSPC procedures compliant with 10 CFR 835.	SNL-NV depends on the expertise of the RSPC to perform radiological monitoring in the workplace, personnel monitoring, release of materials and equipment, and maintenance and calibration of instruments and individual monitoring devices. Records generated in performing these services are retained by the RSPC. SNL-NV retains summary reports provided by the RSPC following radiological activities.	Same as Column 3 and Records generated by the RSPC for services provided to SNJV are maintained by the RSPC.	DRI depends on the expertise of the RSPC to perform radiological monitoring in the workplace, personnel monitoring, release of materials and equipment, and maintenance and calibration of instruments and individual monitoring devices. Records generated in performing these services are retained by the RSPC. DRI retains summary reports provided by the RSPC following radiological activities.	By written agreement, the RSPC conducts monitoring for radiation and radioactive material. The RSPC will maintain all monitoring records.

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	radioactive material packages received from transportation.	radioactive material packages received from transportation.						
703(b) Results of monitoring used to determine individual occupational dose from external and internal sources;	NV/YMP RCM 751.2.b. Records shall be maintained to document the following information: b. Results of monitoring and calculations used to determine individual occupational exposures.	NV/YMP RCM 751.2.b. Records shall be maintained to document the following information: b. Results of monitoring and calculations used to determine individual occupational exposures.	This service is provided to LLNL at the NTS by the RSPC.	This is outside the scope of the LANL/NTS Radiological Control Program. The LANL RP-2 Radiation Information Management Team records and maintains LANL employee dose assessments provided by the NTS RSPC.	SNL-NV depends on the expertise of the RSPC to perform radiological monitoring in the workplace, personnel monitoring, release of materials and equipment, and maintenance and calibration of instruments and individual monitoring devices. Records generated in performing these services are retained by the RSPC. SNL-NV retains summary reports provided by the RSPC following	RCM 141.3.e. The RSPC shall provide the following: e. External and internal dosimetry services. Records generated by the RSPC for services provided to SNJV are maintained by the RSPC.	DRI depends on the expertise of the RSPC to perform radiological monitoring in the workplace, personnel monitoring, release of materials and equipment, and maintenance and calibration of instruments and individual monitoring devices. Records generated in performing these services are retained by the RSPC. DRI retains summary reports provided by the RSPC following	By written agreement, the RSPC conducts monitoring and will maintain all monitoring records.

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					radiological activities.		radiological activities.	
703(c) Results of monitoring for the release and control of material and equipment as required by §835.1101; and	NV/YMP RCM 421.5. Results of monitoring for the release and control of material and equipment as required by Articles 421.1, 421.2, and 421.3 shall be documented and maintained. NV/YMP RCM 751.2. c. Records shall be maintained to document the following information: c. Results of surveys for release of materials from radiological areas.	NV/YMP RCM 421.5. Results of monitoring for the release and control of material and equipment as required by Articles 421.1, 421.2, and 421.3 shall be documented and maintained. NV/YMP RCM 751.2. c. Records shall be maintained to document the following information: c. Results of surveys for release of materials from radiological areas.	The LLNL Radiological Control Program maintains results of monitoring for the release and control of material and equipment as required by 835.1101.	This is outside the scope of the LANL/NTS Radiological Control Program. The NTS RSPC provides trained and qualified Radiological Control Technicians to perform and document radiological surveys per NTS RSPC procedures compliant with 10 CFR 835.	SNL-NV depends on the expertise of the RSPC to perform radiological monitoring in the workplace, personnel monitoring, release of materials and equipment, and maintenance and calibration of instruments and individual monitoring devices. Records generated in performing these services are retained by the RSPC. SNL-NV retains reports provided by the RSPC following radiological activities.	Same as Column 3 and Records generated for SNJV by the RSPC are maintained by the RSPC.	Release surveys are obtained as a service from the RSPC. Records generated from these surveys are maintained by the RSPC.	By written agreement, the RSPC conducts monitoring and will maintain all monitoring records.
703(d) Results of maintenance and	NV/YMP RCM 761.1.	NV/YMP RCM 761.1.	The NTS RSPC provides	This is outside the scope of the	SNL-NV depends on the	Same as Column 3 and Records	DRI depends on the expertise of	Not applicable to WSI/NV.

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calibration performed on instruments and equipment as required by §835.401(b).	Calibration records for fixed, portable and laboratory radiation-measuring equipment and individual monitoring devices shall be maintained and include frequencies, method, dates, personnel, training, and traceability of calibration sources to National Institute of Standards and Technology (see Article 562.1) or other acceptable standards. NV/YMP RCM 761.3. Maintenance histories, corrective actions taken, and calibration	Calibration records for fixed, portable and laboratory radiation-measuring equipment and individual monitoring devices shall be maintained and include frequencies, method, dates, personnel, training, and traceability of calibration sources to National Institute of Standards and Technology (see Article 562.1) or other acceptable standards. NV/YMP RCM 761.3. Maintenance histories, corrective actions taken, and calibration	instrument calibration services for the NTS and maintains the records of radiological survey instrument calibrations required by 835.401(b).	LANL/NTS Radiological Control Program. The NTS RSPC provides instrument calibration services for the NTS and maintains the records of radiological survey instrument calibrations in accordance with 10 CFR 835.	expertise of the RSPC to perform radiological monitoring in the workplace, personnel monitoring, release of materials and equipment, and maintenance and calibration of instruments and individual monitoring devices. Records generated in performing these services are retained by the RSPC. SNL-NV retains summary reports provided by the RSPC following radiological activities.	generated for SNJV by the RSPC are maintained by the RSPC.	the RSPC to perform radiological monitoring in the workplace, personnel monitoring, release of materials and equipment, and maintenance and calibration of instruments and individual monitoring devices. Records generated in performing these services are retained by the RSPC. DRI retains summary reports provided by the RSPC following radiological activities.	WSI/NV does not have radiation measuring instruments or equipment.

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	results for each instrument shall be created and retained.	results for each instrument shall be created and retained.						
835.704 Administrative Records. 704(a) Training records shall be maintained, as necessary, to demonstrate compliance with §835.901.	NV/YMP RCM 725.1.01. Records of training and qualification in radiological control shall be maintained to demonstrate that a person received appropriate information to perform the work assignment in a safe manner.	NV/YMP RCM 725.1.01. Records of training and qualification in radiological control shall be maintained to demonstrate that a person received appropriate information to perform the work assignment in a safe manner.	Radiological training is performed and documented by LLNL Training Office or by the NTS RSPC.	This is outside the scope of the LANL/NTS Radiological Control Program. This radiological training is performed and documented by LANL Central Training - Environment, Safety, and Health (CT-ESH) in Los Alamos or by the NTS RSPC.	Training records for SNL-NV personnel shall be maintained by the organization providing the training.	Same as Column 3 and Records generated for SNJV by the RSPC are maintained by the RSPC.	Training records for DRI personnel shall be maintained by the organization providing the training.	Training records for WSI shall be maintained by the organization providing the training.
704(b) Actions taken to maintain occupational exposures as low as reasonably achievable, including the actions required for this purpose by §835.101, as well as facility design and control actions required by	NV/YMP RCM 712.1. d. A radiological records management program shall be established by each NNSA/NSO and YMORD TO. This program shall ensure that auditable records	Revise: NV/YMP RCM 712.1. d. A radiological records management program shall be established by each NNSA/NSO and OCRWM TO. This program shall ensure that	The records generated for the NTS Contractor's Sitewide ALARA Committee (SWAC) shall be maintained by the RSPC.	ALARA design reviews are outside the scope of the LANL/NTS Radiological Control Program. The LANL/RP-3 Radiological Engineering Team performs and documents	The records generated for the NTS Contractor's Sitewide ALARA Committee (SWAC) shall be maintained by the RSPC.	The records generated for the NTS Contractor's Sitewide ALARA Committee (SWAC) shall be maintained by the RSPC.	Not applicable to DRI. Facility design and ALARA review are outside the scope of DRI NTS activities. The records generated for the NTS Contractor's SWAC shall be	The records generated for the NTS Contractor's Sitewide ALARA Committee (SWAC) shall be maintained by the RSPC.

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§§835.1001, 835.1002, and 835.1003, shall be documented.	and reports are controlled through the stages of creation, distribution, use, arrangement, storage, retrieval, media conversion (if applicable), and disposition. The records management program shall include items a through k below, and should include the remaining items: d. ALARA records. The records generated for the NTS Contractor's Sitewide ALARA Committee (SWAC) shall be maintained by NSTec.	auditable records and reports are controlled through the stages of creation, distribution, use, arrangement, storage, retrieval, media conversion (if applicable), and disposition. The records management program shall include items a through k below, and should include the remaining items: d. ALARA records. The records generated for the NTS Contractor's Sitewide ALARA Committee (SWAC) shall be maintained by NSTec.		the ALARA review of the design of new LANL/NTS facilities or the modification of existing LANL/NTS facilities. LANL/NTS performs and documents ALARA reviews of radiological jobs. The records generated for the NTS Contractor's Sitewide ALARA Committee (SWAC) shall be maintained by the RSPC.			maintained by the RSPC.	
704(c) Records shall be maintained to	NV/YMP RCM 712.1.03.k.	NV/YMP RCM 712.1.03.k.	Same as Column 3	Same as Column 3	SNL-NV will participate in the	Same as Column 3	Cross Reference NV/YMP RCM	Same as Column 3

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document the results of internal audits and other reviews of program content and implementation.	The records management program shall include items a through k below, and should include the remaining items: k. Records that document the results of internal audits, assessments, and other reviews of program content and implementation.	The records management program shall include items a through k below, and should include the remaining items: k. Records that document the results of internal audits, assessments, and other reviews of program content and implementation.			NTS RCM internal audit program. Records will be retained by the SNL-NV ES&H representative.		712.1.03.k DRI will participate in the NTS RCM internal audit program. The RSPC will maintain the original copy of these assessments. Copies received by DRI will be retained by the DRI ES&H office for a minimum of three years after each assessment cycle has been completed.	
704(d) Written declarations of pregnancy, including the estimated date of conception, and revocations of declarations of pregnancy shall be maintained.	NV/YMP RCM 723.2. Written declaration of pregnancy, including the estimated date of conception, and revocations of declaration of pregnancy shall be maintained.	NV/YMP RCM 723.2. Written declaration of pregnancy, including the estimated date of conception, and revocations of declaration of pregnancy shall be maintained.	Written declarations of pregnancy are maintained by LLNL Occupational Medicine in Livermore.	This is outside the scope of the LANL/NTS Radiological Control Program. Written declarations of pregnancy are maintained by LANL Occupational Medicine in Los	These records will be maintained by Albuquerque External Dosimetry Section.	These records are generated within SNJV, line management is notified, and a copy is forwarded to SNJV human resources. The original declaration is forwarded to the	These records are maintained by Business Center "North" Risk Management.	Same as Column 3

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				Alamos.		RSPC as a dosimetry record.		
704(e) Changes in equipment, techniques, and procedures used for monitoring shall be documented.	NV/YMP RCM 551.3. The RCO shall document changes in equipment, techniques, and procedures used for monitoring.	NV/YMP RCM 551.3. The RCO shall document changes in equipment, techniques, and procedures used for monitoring.	Same as Column 3	Same as Column 3	This service is provided to SNL-NV by the RSPC.	Same as Column 3	Not applicable to DRI operations. This service is provided to DRI by the RSPC.	Not applicable to WSI/NV operations. By written agreement, monitoring is provided by the RSPC. The RSPC is responsible for documenting changes in equipment, techniques, and procedures used for monitoring.
704(f) Records shall be maintained as necessary to demonstrate compliance with the requirements of §§835.1201 and 835.1202 for sealed radioactive source control, inventory, and source leak tests.	NV/YMP RCM 755.01. Records shall be maintained as necessary to demonstrate compliance with Article 431.01 and 431.2.a-e.	NV/YMP RCM 755.01. Records shall be maintained as necessary to demonstrate compliance with Article 431.01 and 431.2.a-e.	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	Sealed sources owned by DRI are licensed for use under the UNR Radioactive Material License #16-13-0003-07. See UNR RSM Procedure III: Radiation Source Control Procedures, Procedure VI: Radiation Source Storage	Not applicable to WSI/NV. WSI/NV is not a sealed radioactive source custodian and is not responsible for sealed radioactive source control, inventory, or source leak tests.

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							Procedures, and Procedure XII: Leak Testing Procedure. The RSPC provides leak testing and inventory services for DRI sealed sources used and stored at the NTS. Copies of these reports are forwarded to the UNR radiation safety office upon receipt.	
Subpart I-Reports to Individuals 835.801 Reports to individuals 801(a) Radiation exposure data for individuals monitored in accordance with §835.402 shall be reported as specified in this section. The information shall include the data	NV/YMP RCM 781.1.a. Annual and Current Dosimetry Reports a. Personnel who are monitored by the personnel dosimetry program according to 10 CFR 835.402 shall be provided an annual report of their dose	NV/YMP RCM 781.1.a. Annual and Current Dosimetry Reports a. Personnel who are monitored by the personnel dosimetry program according to 10 CFR 835.402 shall be provided an annual report of their dose	LLNL-N has an agreement in place where the RSPC provides dosimetry information to LLNL-Livermore, and LLNL- Livermore generates all reports to individuals.	This is outside the scope of the LANL/NTS Radiological Control Program. The LANL RP-2 Radiation Information Management Team records and maintains LANL employee dose assessments provided by the	This report shall be provided to SNL personnel by the Dosimetry Records Organization in Albuquerque.	NV/YMP RCM 141.3.e. The RSPC shall provide the following: e. External and internal dosimetry services. Records generated by the RSPC for services provided to	Dosimetry services are provided to DRI by RSPC. The RSPC mails these reports to the address of record for the monitored individual. If no address is on file, the reports are sent in sealed envelopes to DRI	By written agreement, dosimetry services are provided by the RSPC. By written agreement, the RSPC provides dosimetry services to WSI/NV and maintains individual

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required under §835.702. (c). Each notification and report shall be in writing and include: the DOE site or facility name, the name of the individual, and the individual's social security number, employee number, or other unique identification number.	including the information required by 10 CFR 835.702(c). NV/YMP RCM 781.3. Reports of individual doses shall include the site or facility name, the individual's name and social security number or employee number or other unique identifiers.	including the information required by 10 CFR 835.702(c). NV/YMP RCM 781.3. Reports of individual doses shall include the site or facility name, the individual's name and social security number or employee number or other unique identifiers.		NTS RSPC. The LANL/NTS ESH-12 Radiation Information Management Team records and maintains LANL employee dose assessments.		SNJV are maintained by the RSPC.	EH&S who then sends them on to the individual.	records.
801(b) Upon the request from an individual terminating employment, records of exposure shall be provided to that individual as soon as the data are available, but not later than 90 days after termination. A written estimate of the radiation dose received by that employee based on available information	NV/YMP RCM 781.2. Termination Dosimetry Reports. Upon the request from an individual terminating employment, records of exposure shall be provided to that individual as soon as the data	NV/YMP RCM 781.2. Termination Dosimetry Reports. Upon the request from an individual terminating employment, records of exposure shall be provided to that individual as soon as the data	LLNL-N has an agreement in place where the RSPC provides dosimetry information to LLNL-Livermore, and LLNL-Livermore generates all reports to individuals.	This is outside the scope of the LANL/NTS Radiological Control Program. The LANL RP-2 Radiation Information Management Team records and maintains LANL employee dose assessments provided by the	This report shall be provided to SNL personnel by the Dosimetry Records Organization in Albuquerque.	NV/YMP RCM 141.3.e. The RSPC shall provide the following: e. External and internal dosimetry services. Records generated by the RSPC for services provided to	Dosimetry services are provided to DRI by RSPC. The RSPC mails these reports to the address of record for the monitored individual. If no address is on file, the reports are sent in sealed envelopes to DRI	By written agreement, the RSPC provides dosimetry services to WSI/NV and maintains individual records.

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shall be provided at the time of termination, if requested.	are available, but not later than 90 days after termination. A written estimate of the radiation dose received by that employee based on available information shall be provided at the time of termination, if requested.	are available, but not later than 90 days after termination. A written estimate of the radiation dose received by that employee based on available information shall be provided at the time of termination, if requested.		NTS RSPC.		SNJV are maintained by the RSPC.	EH&S who then sends them on to the individual.	
801(c) Each DOE- or DOE-contractor-operated site or facility shall, on an annual basis, provide a radiation dose report to each individual monitored during the year at that site or facility in accordance with §835.402.	NV/YMP RCM 781.1.a. Annual and Current Dosimetry Reports a. Personnel who are monitored by the personnel dosimetry program according to 10 CFR 835.402 shall be provided an annual report of their dose including the information required by 10	NV/YMP RCM 781.1.a. Annual and Current Dosimetry Reports a. Personnel who are monitored by the personnel dosimetry program according to 10 CFR 835.402 shall be provided an annual report of their dose including the information required by 10	LLNL-N has an agreement in place where the RSPC provides dosimetry information to LLNL-Livermore, and LLNL-Livermore generates all reports to individuals.	This is outside the scope of the LANL/NTS Radiological Control Program. The LANL RP-2 Radiation Information Management Team records and maintains LANL employee dose assessments provided by the NTS RSPC.	This report shall be provided to SNL personnel by the Dosimetry Records Organization in Albuquerque.	RCM 141.3.e. The RSPC shall provide the following: (e) External and internal dosimetry services. Records generated by the RSPC for services provided to SNJV are maintained by the RSPC.	Dosimetry services are provided to DRI by RSPC. The RSPC mails these reports to the address of record for the monitored individual. If no address is on file, the reports are sent in sealed envelopes to DRI EH&S who then sends them on to the individual.	By written agreement, the RSPC provides dosimetry services to WSI/NV.

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	CFR 835.702(c).	CFR 835.702(c).						
801(d) Detailed information concerning any individual's exposure shall be made available to the individual upon request of that individual, consistent with the provisions of the Privacy Act (5 U.S.C. 552a).	NV/YMP RCM 781.1.b. Annual and Current Dosimetry Reports b. Detailed information concerning an individual's exposure shall be made available to that individual, upon request, consistent with the Privacy Act of 1974, which contains requirements to protect the privacy of individual records.	NV/YMP RCM 781.1.b. Annual and Current Dosimetry Reports b. Detailed information concerning an individual's exposure shall be made available to that individual, upon request, consistent with the Privacy Act of 1974, which contains requirements to protect the privacy of individual records.	LLNL-N has an agreement in place where the RSPC provides dosimetry information to LLNL-Livermore, and LLNL-Livermore generates all reports to individuals.	This is outside the scope of the LANL/NTS Radiological Control Program. The LANL RP-2 Radiation Information Management Team records and maintains LANL employee dose assessments provided by the NTS RSPC.	Provided by Dosimetry Records Organization in Albuquerque.	RCM 141.3.e. The RSPC shall provide the following: (e) External and internal dosimetry services. Records generated by the RSPC for services provided to SNJV are maintained by the RSPC.	Dosimetry services are provided to DRI by RSPC. The RSPC mails these reports to the address of record for the monitored individual. If no address is on file, the reports are sent in sealed envelopes to DRI EH&S, who then sends them on to the individual.	Same as Column 3
801(e) When a DOE contractor is required to report to the Department, pursuant to Departmental requirements for occurrence reporting and processing, any exposure of an	NV/YMP RCM 781.4. Reports of individual exposure to radiation or radioactive material required under DOE M 231.1-2,	NV/YMP RCM 781.4. Reports of individual exposure to radiation or radioactive material required under DOE M 231.1-2,	The requirement for a planned special exposure is outside the scope of LLNL activities. LLNL-N has an agreement in place where the	This is outside the scope of the LANL/NTS Radiological Control Program. The requirement for a planned special exposure is outside the	Same as Column 3	Same as Column 3	NOTE: The requirement for a planned special exposure is outside the scope of DRI's NTS activities and as such is not applicable.	Same as Column 3

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individual to radiation and/or radioactive material, or planned special exposure in accordance with §835.204(e), the contractor shall also provide that individual with a report on his or her exposure data included therein. Such report shall be transmitted at a time not later than the transmittal to the Department.	“Occurrence Reporting and Processing of Operations Information” shall be submitted to DOE or NNSA/NSO according to departmental occurrence reporting requirements. Copies of the individual dose information contained in these reports shall be provided to the affected individual at a time not later than transmittal of the report to the DOE or NNSA/NSO.	“Occurrence Reporting and Processing of Operations Information” shall be submitted to DOE or NNSA/NSO according to departmental occurrence reporting requirements. Copies of the individual dose information contained in these reports shall be provided to the affected individual at a time not later than transmittal of the report to the DOE or NNSA/NSO.	RSPC provides dosimetry information to LLNL-Livermore, and LLNL-Livermore generates all reports to individuals.	scope of LANL/NTS activities. The LANL RP-2 Radiation Information Management Team records and maintains LANL employee dose assessments provided by the NTS RSPC.				
Subpart J-Radiation Safety Training 835.901 Radiation Safety Training.	NV/YMP RCM 621.01-02. Individuals who may enter Controlled Areas and encounter radiological	NV/YMP RCM 621.01-02. Individuals who may enter Controlled Areas and encounter radiological	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	Cross reference NV/YMP RCM 621.01, 621.02, 612.3.02. DRI is in compliance with	Same as Column 3

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901(a) Each individual shall complete radiation safety training on the topics established at §835.901(c) commensurate with the hazards in the area and the required controls: (1) Before being permitted unescorted access to controlled areas; and (2) Before receiving occupational dose during access to controlled areas at a DOE site or facility.	barriers, postings, or radioactive materials shall complete GERT unless RW-I, RW-II, or RCT training is current. This training shall be successfully completed before receiving occupational radiation dose. NV/YMP RCM 612.3.02. Documentation of previous training shall include the individual's name, date of training, topics covered, and the name of the certifying official.	barriers, postings, or radioactive materials shall complete GERT unless RW-I, RW-II, or RCT training is current. This training shall be successfully completed before receiving occupational radiation dose. NV/YMP RCM 612.3.02. Documentation of previous training shall include the individual's name, date of training, topics covered, and the name of the certifying official.					the training requirement. Except for GERT, which is done in-house using an RSPC-developed CBT, training is provided by the RSPC. GERT records are submitted to the RSPC, and with the balance of training generated by them, records are maintained by the RSPC. Records received by DRI attendees are entered into a training data base by the DRI Classified and Unclassified Security Officer or designee.	
901(b) Each individual shall demonstrate knowledge of the radiation safety	NV/YMP RCM 613.1.01. Examinations for RW-I and RW-II	NV/YMP RCM 613.1.01. Examinations for RW-I and RW-II	Radiological training is performed and documented by	This is outside the scope of the LANL/NTS Radiological	Same as Column 3	Same as Column 3	Cross reference NV/YMP RCM 613.1.01, 631.1.d, 631.1,	Same as Column 3

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<p>training topics established in §835.901(c), commensurate with the hazards in the area and required controls, by successful completion of an examination and performance demonstrations:</p> <p>(1) Before being permitted unescorted access to radiological areas; and</p> <p>(2) Before performing unescorted assignments as a radiological worker.</p>	<p>training and RCT qualification shall be used to demonstrate knowledge of the radiation safety training topics presented in the course material.</p> <p>NV/YMP RCM 613.1.04.d. The examination process should require:</p> <p>(d) In addition to an examination, RW-I, RW-II, and RCT personnel in training classes shall be required to complete performance demonstrations commensurate with their duties.</p> <p>NV/YMP RCM 631.1. RW-I or RW-II training is required for unescorted entry into areas as</p>	<p>training and RCT qualification shall be used to demonstrate knowledge of the radiation safety training topics presented in the course material.</p> <p>NV/YMP RCM 613.1.04.d. The examination process should require:</p> <p>(d) In addition to an examination, RW-I, RW-II, and RCT personnel in training classes shall be required to complete performance demonstrations commensurate with their duties.</p> <p>NV/YMP RCM 631.1. RW-I or RW-II training is required for unescorted entry into areas as</p>	LLNL Training Office or by the NTS RSPC.	Control Program. This radiological training is performed and documented by LANL CT-ESH in Los Alamos or by the NTS RSPC.			<p>632.01 and 633.01.</p> <p>DRI is in compliance with this training requirement. Except for GERT, which is done in-house using an RSPC-developed CBT, training is provided by the RSPC. GERT records are submitted to the RSPC, and with the balance of training generated by them, records are maintained by the RSPC. Records received by DRI attendees are entered into a training data base by the DRI Classified and Unclassified Security Officer</p>	

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	<p>stated in Table 6-1.</p> <p>NV/YMP RCM 632.01. Workers whose job assignments involve working with radioactive materials or entry into Radiation Areas or RMAs and Underground RMAs (greater than 100 mrem/yr), shall complete RW-I training.</p> <p>NV/YMP RCM 633.01. Workers whose job assignments involve entry into High Radiation Areas, Contamination Areas, High Contamination Areas, and Airborne Radioactivity</p>	<p>stated in Table 6-1.</p> <p>NV/YMP RCM 632.01. Workers whose job assignments involve working with radioactive materials or entry into Radiation Areas or RMAs and Underground RMAs (greater than 100 mrem/yr), shall complete RW-I training.</p> <p>NV/YMP RCM 633.01. Workers whose job assignments involve entry into High Radiation Areas, Contamination Areas, High Contamination Areas, and Airborne Radioactivity</p>					or designee.	

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	Areas shall complete RW-II training.	Areas shall complete RW-II training.						
901(c) Radiation safety training shall include the following topics, to the extent appropriate to each individual's prior training, work assignments, and degree of exposure to potential radiological hazards: (1) Risks of exposure to radiation and radioactive materials, including prenatal radiation exposure; (2) Basic radiological fundamentals and radiation protection concepts; (3) Physical design features, administrative controls, limits, policies, procedures, alarms, and other measures implemented at the facility to manage doses and maintain	NV/YMP RCM 612.1. Standardized core course training material shall be used for GERT, RW-I, RW-II, and RCT training. The standardized core courses are presented and site-specific information is added.	NV/YMP RCM 612.1. Standardized core course training material shall be used for GERT, RW-I, RW-II, and RCT training. The standardized core courses are presented and site-specific information is added.	This is outside the scope of the LLNL-N Radiological Control Program. This radiological training is performed and documented by LLNL in Livermore or by the NTS RSPC.	This radiological training is performed and documented by LANL CT-ESH in Los Alamos or by the NTS RSPC. LANL/NTS is responsible to assure that radiological training is current (has been performed within the previous 24 months).	Same as Column 3	Same as Column 3	Not applicable to DRI Radiation Safety Training content is not developed by DRI as radiation safety training for DRI employees is provided by the RSPC and/or the UNR RSO dependent on what the affected employee's job entails.	WSI/NV or the RSPC may provide GERT training for WSI employees. The RSPC provides RW-I and RW-II training.

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<p>doses ALARA including both routine and emergency actions;</p> <p>(4) Individual rights and responsibilities as related to implementation of the facility radiation protection program;</p> <p>(5) Individual responsibilities for implementing ALARA measures required by §835.101; and</p> <p>(6) Individual exposure reports that may be requested in accordance with §835.801.</p>								
<p>901(d) When an escort is used in lieu of training in accordance with paragraph (a) or (b) of this section, the escort shall:</p> <p>(1) Have completed radiation safety training, examinations, and performance demonstrations required for entry to the area and</p>	<p>NV/YMP RCM 657. When an escort is used in lieu of training according to Chapter 3, Part 3, "Entry and Exit Requirements" (Articles 331, 333, 334, 335, 336, and 365), the escort shall:</p> <p>1. Have</p>	<p>NV/YMP RCM 657. When an escort is used in lieu of training according to Chapter 3, Part 3, "Entry and Exit Requirements" (Articles 331, 333, 334, 335, 336, and 365), the escort shall:</p> <p>1. Have</p>	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3

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performance of the work; and (2) Ensure that all escorted individuals comply with the documented radiation protection program.	completed radiation safety training, examinations, and performance demonstrations required for entry into the area and performance of the work. 2. Ensure that all escorted individuals comply with the documented radiation protection program.	completed radiation safety training, examinations, and performance demonstrations required for entry into the area and performance of the work. 2. Ensure that all escorted individuals comply with the documented radiation protection program.						
901(e) Radiation safety training shall be provided to individuals when there is a significant change to radiation protection policies and procedures that may affect the individual and at intervals not to exceed 24 months. Such training provided for individuals subject to the requirements of §835.901(b) (1) and	NV/YMP RCM 613.3.a. GERT, RW-I, RW-II, and RCT training shall be completed every 24 months. a. Changes to the program shall be incorporated as they are identified and a decision made by the RadCon Managers'	NV/YMP RCM 613.3.a. GERT, RW-I, RW-II, and RCT training shall be completed every 24 months. a. Changes to the program shall be incorporated as they are identified and a decision made by the RadCon Managers'	Radiological training is performed and documented by LLNL Training Office or by the RSPC.	This radiological training is performed and documented by LANL CT-ESH in Los Alamos or by the NTS RSPC.	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3

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(b) (2) shall include successful completion of an examination.	Council whether retraining before the expiration of the 24-month period is needed.	Council whether retraining before the expiration of the 24-month period is needed.						
835.902-835.903 [Reserved]								
Subpart K--Design and Control. 835.1001 Design and control. 1001(a) Measures shall be taken to maintain radiation exposure in controlled areas ALARA through engineered and administrative controls. The primary methods used shall be engineered controls (e.g., confinement, ventilation, remote handling, and shielding.) Administrative controls shall be employed only as supplemental methods to control radiation exposure.	NV/YMP RCM 311.02-03. The primary methods used to maintain exposures ALARA shall be facility and equipment design features. These features shall be augmented by administrative and procedural requirements.	Revise: NV/YMP RCM 311.01-03. Measures shall be taken to maintain radiation exposure in controlled areas ALARA through engineered and administrative controls. The primary methods used shall be engineered controls (e.g., confinement, ventilation, remote handling, and shielding). Administrative controls shall be employed only as supplemental methods to control radiation	Actions taken to maintain personnel exposures ALARA through administrative controls are documented through LLNL Narrative Section, 4.0 and NTS RPP Narrative Section 7.0 ALARA Program. LLNL-N will be responsible for looking at all ALARA reviews made on the design of all facilities for which LLNL-N has operational responsibility and commenting on	By written agreement between LANL/NTS and the LANL/RP-3 Radiological Engineering Team, the LANL/RP-3 Radiological Engineering Team will perform and document the ALARA reviews of the design of new NTS facilities or the modification of existing NTS facilities by LANL/NTS.	Same as Column 3	NV/YMP RCM 316.2. Administrative controls, including access restrictions and the use of specific work practices designed to minimize airborne radioactivity, shall be used as the secondary method to minimize worker internal exposure.	Not applicable to DRI. Facility and equipment design to achieve ALARA are outside the scope of DRI activities. Actions taken to maintain personnel exposures ALARA through administrative controls are documented through DRI Narrative Section 4.0 and NTS RPP Narrative Section 7.0 ALARA Program.	Facility and equipment design and control to maintain radiation exposure in controlled areas ALARA is beyond the scope of WSI/NV radiological control responsibilities. The WSI/NV ES&H section will review all operations including WSI/NV personnel to maintain radiation exposure ALARA.

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		exposure.	and providing appropriate input to the review process.					WSI/NV will comply with all administrative controls employed by the TO with radiological control responsibilities.
1001(b) For specific activities where use of engineered controls is demonstrated to be impractical, administrative controls shall be used to maintain radiation exposures ALARA.	NV/YMP RCM 311.02-03. The primary methods used to maintain exposures ALARA shall be facility and equipment design features. These features shall be augmented by administrative and procedural requirements.	Add: NV/YMP RCM 311.05. For specific activities where use of engineered controls is demonstrated to be impractical, administrative controls shall be used to maintain radiation exposures ALARA.	Actions taken to maintain personnel exposures ALARA through administrative controls are documented through LLNL Narrative Section 4.0 and NTS RPP Narrative Section 7.0 ALARA Program.	By written agreement between LANL/NTS and the LANL/RP-3 Radiological Engineering Team, the LANL/RP-3 Radiological Engineering Team will perform and document the ALARA review of the design of new LANL/NTS facilities or the modification of existing LANL/NTS facilities.	NV/YMP RCM 311. Technical requirements for the conduct of work, including construction, modifications, operations, maintenance, and decommissioning shall incorporate radiological criteria to ensure safety and maintain radiation exposures ALARA. The primary methods used to maintain exposures ALARA shall be facility and	Same as Column 3	NV/YMP RCM 311. Technical requirements for the conduct of work, including construction, modifications, operations, maintenance, and decommissioning shall incorporate radiological criteria to ensure safety and maintain radiation exposures ALARA. The primary methods used to maintain exposures ALARA shall be facility and	NV/YMP RCM 311. Technical requirements for the conduct of work, including construction, modifications, operations, maintenance, and decommissioning shall incorporate radiological criteria to ensure safety and maintain radiation exposures ALARA. The primary methods used to maintain exposures ALARA shall be facility and

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					equipment design features. These features shall be augmented by administrative and procedural requirements. The design and planning processes shall incorporate radiological considerations in the early planning stages.		equipment design features. These features shall be augmented by administrative and procedural requirements. The design and planning processes shall incorporate radiological considerations in the early planning stages.	equipment design features. These features shall be augmented by administrative and procedural requirements. The design and planning processes shall incorporate radiological considerations in the early planning stages.
835.1002 Facility design and modifications. During the design of new facilities or modification of existing facilities, the following objectives shall be adopted: 1002(a) Optimization methods shall be used to assure that occupational exposure is maintained ALARA in developing and justifying facility design	NV/YMP RCM 312.7. Optimization methods shall be used to ensure that occupational exposure is maintained ALARA in developing and justifying facility design and physical controls for new facilities or modifications of existing facilities.	NV/YMP RCM 312.7. Optimization methods shall be used to ensure that occupational exposure is maintained ALARA in developing and justifying facility design and physical controls for new facilities or modifications of existing facilities.	LLNL-N will be responsible for reviewing all ALARA reviews made on the design of all facilities for which LLNL-N has operational responsibility and commenting on and providing appropriate input to the review process.	This is outside the scope of the LANL/NTS Radiological Control Program. By written agreement between LANL/NTS and the LANL/RP-3 Radiological Engineering Team, the LANL/RP-3 Radiological Engineering Team will	Same as Column 3	Same as Column 3	Not applicable to DRI. Facility and equipment design to achieve ALARA are outside the scope of DRI activities.	Not applicable to WSI/NV operations. Facility design and modifications are outside the scope of WSI/NV radiological control responsibilities.

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and physical controls.				perform and document the A3LARA review of the design of new LANL/NTS facilities or the modification of existing LANL/NTS facilities.				
1002(b) The design objective for controlling personnel exposure from external sources of radiation in areas of continuous occupational occupancy (2000 hours per year) shall be to maintain exposure levels below an average of 0.5 millirem (5 μ Sv) per hour and as far below this average as is reasonably achievable. The design objectives for exposure rates for potential exposure to a radiological worker where occupancy	NV/YMP RCM 128.1.a-b. General design criteria for new facilities and major modifications to existing facilities are contained in 10 CFR 835 and DOE Order 6430.1A, "General Design Criteria." In addition, the following radiological control design criteria are provided for new facilities and major modifications to	Revise: NV/YMP RCM 128.1.a-b. General design criteria for new facilities and major modifications to existing facilities are contained in 10 CFR 835 and DOE Order 420.1B, "Facility Safety." In addition, the following radiological control design criteria are provided for new facilities and major modifications to existing facilities:	LLNL-N will be responsible for reviewing all ALARA reviews made on the design of all facilities for which LLNL-N has operational responsibility and commenting on and providing appropriate input to the review process.	This is outside the scope of the LANL/NTS Radiological Control Program. By written agreement between LANL/NTS and the LANL/RP-3 Radiological Engineering Team, the LANL/RP-3 Radiological Engineering Team will perform and document the ALARA review of the design of new LANL/NTS facilities or the	Same as Column 3	Same as Column 3	Not applicable to DRI. Facility and equipment design to achieve ALARA are outside the scope of DRI activities.	Not applicable to WSI/NV operations. Facility design and modifications are outside the scope of WSI/NV radiological control responsibilities.

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differs from the above shall be ALARA and shall not exceed 20 percent of the applicable standards in §835.202.	existing facilities: a. For areas of continuous occupancy (2,000 hours per year), the design objective shall be to maintain the average exposure levels ALARA and shall not exceed 0.5 mrem per hour. b. If occupancy is not continuous, the design objective shall be to maintain doses ALARA and shall not exceed 20 percent of the occupational dose limits provided in Table 2-1.	a. For areas of continuous occupancy (2,000 hours per year), the design objective shall be to maintain the average exposure levels ALARA and shall not exceed 0.5 mrem per hour. b. If occupancy is not continuous, the design objective shall be to maintain doses ALARA and shall not exceed 20 percent of the occupational dose limits provided in Table 2-1.		modification of existing LANL/NTS facilities.				
1002(c) Regarding the control of airborne radioactive material, the design objective shall be, under normal conditions, to avoid	NV/YMP RCM 316.1. Engineering controls, including containment of	NV/YMP RCM 316.1. Engineering controls, including containment of	LLNL-N will be responsible for reviewing all ALARA reviews made on the design of all	This is outside the scope of the LANL/NTS Radiological Control Program. By written	Same as Column 3	Same as Column 3	Not applicable to DRI. Facility and equipment design to achieve ALARA are outside the	Not applicable to WSI/NV operations. Facility design and modifications are

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releases to the workplace atmosphere and in any situation, to control the inhalation of such material by workers to levels that are ALARA; confinement and ventilation shall normally be used.	radioactive material at the source, shall be the primary method of minimizing airborne radioactivity and internal exposure to workers.	radioactive material at the source, shall be the primary method of minimizing airborne radioactivity and internal exposure to workers.	facilities for which LLNL-N has operational responsibility and commenting on and providing appropriate input to the review process.	agreement between LANL/NTS and the LANL/RP-3 Radiological Engineering Team, the LANL/RP-3 Radiological Engineering Team will perform and document the ALARA review of the design of new LANL/NTS facilities or the modification of existing LANL/NTS facilities.			scope of DRI activities.	outside the scope of WSI/NV radiological control responsibilities.
1002(d) The design or modification of a facility and the selection of materials shall include features that facilitate operations, maintenance, decontamination, and decommissioning.	NV/YMP RCM 128.1.e. In addition, the following radiological control design criteria are provided for new facilities and major modifications to existing facilities:	NV/YMP RCM 128.1.e. In addition, the following radiological control design criteria are provided for new facilities and major modifications to existing facilities:	LLNL-N will be responsible for reviewing all ALARA reviews made on the design of all facilities for which LLNL-N has operational responsibility and commenting on and providing	This is outside the scope of the LANL/NTS Radiological Control Program. By written agreement between LANL/NTS and the LANL/RP-3 Radiological Engineering	Same as Column 3	NV/YMP RCM 128.1.e. In addition, the following radiological control design criteria are provided for new facilities and major modifications to existing facilities:	Not applicable to DRI. Facility and equipment design to achieve ALARA are outside the scope of DRI activities.	Not applicable to WSI/NV operations. Facility design and modifications are outside the scope of WSI/NV radiological control responsibilities.

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	e. Efficiency of maintenance, decontamination, operations, and decommissioning shall be maximized.	e. Efficiency of maintenance, decontamination, operations, and decommissioning shall be maximized.	appropriate input to the review process.	Team, the LANL/RP-3 Radiological Engineering Team will perform and document the ALARA review of the design of new LANL/NTS facilities or the modification of existing LANL/NTS facilities.		e. Efficiency of maintenance, decontamination, operations, and decommissioning shall be maximized.		
835.1003 Workplace controls During routine operations, the combination of engineered and administrative controls shall provide that: 1003(a) The anticipated occupational dose to general employees shall not exceed the limits established at §835.202; and	NV/YMP RCM 211.1. 01. NNSA/NSO and YMORD TOs have established the annual Administrative Control Level at 500 mrem total effective dose equivalent (TEDE). NV/YMP RCM 213.1. Except for emergency exposures authorized	Revise: NV/YMP RCM 211.1. 01. NNSA/NSO and OCRWM TOs have established the annual Administrative Control Level at 500 mrem total effective dose (TED). Revise: NV/YMP RCM 213.1. Except for emergency exposures authorized	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3

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	<p>according to 10 CFR 835.1302, the occupational dose received by general employees shall be controlled such that the following limits are not exceeded in a year.</p> <p>a. A TEDE of 5 rem (0.05 sievert);</p> <p>b. The sum of the deep dose equivalent for external exposures and the committed dose equivalent to any organ or tissue other than the lens of the eye of 50 rem (0.5 sievert);</p> <p>c. A lens of the eye dose equivalent of 15 rem (0.15 sievert); and</p>	<p>according to 10 CFR 835.1302, the occupational dose received by general employees shall be controlled such that the following limits are not exceeded in a year.</p> <p>a. A TED of 5 rems (0.05 sievert);</p> <p>b. The sum of the equivalent dose to the whole body for external exposures and the committed equivalent dose to any organ or tissue other than the lens of the eye of 50 rems (0.5 sievert);</p> <p>c. An equivalent dose to the lens of the eye of 15 rems (0.15 sievert); and</p>						

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	d. A shallow dose equivalent of 50 rem (0.5 sievert) to the skin or to any extremity. Deep dose equivalent to the whole body may be used as the effective dose equivalent for external exposures. The TEDE during a year shall be determined by summing the effective dose equivalent from external exposures and the CEDE from intakes during the year and shall be used when demonstrating compliance with Table 2-1 dose limits. All occupational doses received	d. An equivalent dose to the skin or to an extremity of 50 rems (0.5 sievert). The equivalent dose to the whole body may be used as the effective dose for external exposures. The TED during a year shall be determined by summing the effective dose from external exposures and the CED from intakes during the year and shall be used when demonstrating compliance with Table 2-1 dose limits. All occupational doses received during the current year except						

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	during the current year except emergency exposures authorized according to 10 CFR 835.1302 shall be included. Occupational dose limits are summarized in Table 2-1.	emergency exposures authorized according to 10 CFR 835.1302 shall be included. Occupational dose limits are summarized in Table 2-1. Add: NV/YMP RCM 311.06: During routine operations, the combination of engineered and administrative controls shall provide that: The anticipated occupational dose to general employees shall not exceed the limits established in Table 2-1.						
1003(b) The ALARA process is utilized for personnel exposures to ionizing radiation.	NV/YMP RCM 111. ALARA .02. As Low As Reasonably Achievable.	Add: RCM 111.ALARA.01 The ALARA process is utilized for	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	DRI Appendix F, Narrative Section: 4.0 ALARA Commitment.	Same as Column 3

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	Radiation exposure of the work force and public shall be controlled such that radiation exposures are maintained within acceptable limits and as far below these limits as is reasonably achievable.	personnel exposures to ionizing radiation.						
Subpart L- Radioactive Contamination Control. 835.1101 Control of material and equipment. 1101(a) Except as provided in paragraphs (b) and (c) of this section, material and equipment in contamination areas, high contamination areas, and airborne radioactivity areas shall not be released	NV/YMP RCM 421.1. Except as provided in Articles 421.2 and 421.3, material and equipment in Contamination Areas, High Contamination Areas, and Airborne Radioactivity Areas shall not be released to a Controlled Area if: a. Removable surface contamination	NV/YMP RCM 421.1. Except as provided in Articles 421.2 and 421.3, material and equipment in Contamination Areas, High Contamination Areas, and Airborne Radioactivity Areas shall not be released to a Controlled Area if: a. Removable surface contamination	Same as Column 3	Same as Column 3	SNL-NV does not release materials and equipment from radiological areas at NTS. This service is provided for SNL by the RSPC.	Same as Column 3	Not applicable. DRI does not release materials and equipment from radiological areas at NTS. This service is provided to DRI by the RSPC.	Not applicable. Release of material and equipment is beyond the scope of WSI/NV radiological control responsibilities.

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to a controlled area if: (1) Removable surface contamination levels on accessible surfaces exceed the removable surface contamination values specified in Appendix D of this part; or (2) Prior use suggests that the removable surface contamination levels on inaccessible surfaces are likely to exceed the removable surface contamination values specified in Appendix D of this part.	levels on accessible surfaces exceed the removable surface contamination values specified in Table 2-2. b. Prior use suggests that the removable surface contamination levels on the inaccessible surfaces are likely to exceed the removable surface contamination values specified in Table 2-2.	levels on accessible surfaces exceed the removable surface contamination values specified in Table 2-2. b. Prior use suggests that the removable surface contamination levels on the inaccessible surfaces are likely to exceed the removable surface contamination values specified in Table 2-2.						
1101(b) Material and equipment exceeding the removable surface contamination values specified in appendix D of this part may be conditionally released for movement on-site from one radiological area for immediate placement in another	NV/YMP RCM 421.3. Material and equipment exceeding the removable contamination values specified in Table 2-2 may be conditionally released for movement onsite	NV/YMP RCM 421.3. Material and equipment exceeding the removable contamination values specified in Table 2-2 may be conditionally released for movement onsite	Same as Column 3	Same as Column 3	SNL-NV does not release materials and equipment from radiological areas at NTS. This service is provided for SNL by the RSPC.	Same as Column 3	Not applicable. DRI does not release materials and equipment from radiological areas at NTS. This service is provided to DRI by the RSPC.	Not applicable. Release of material and equipment is beyond the scope of WSI/NV radiological control responsibilities.

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radiological area only if appropriate monitoring is performed and appropriate controls for the movement are established and exercised.	from one radiological area for immediate placement in another radiological area only if appropriate monitoring is performed and appropriate controls for movement are established and exercised.	from one radiological area for immediate placement in another radiological area only if appropriate monitoring is performed and appropriate controls for movement are established and exercised.						
1101(c) Material and equipment with fixed contamination levels that exceed the total surface contamination values specified in appendix D of this part may be released for use in controlled areas outside of radiological areas only under the following conditions: (1) Removable surface contamination levels are below the removable surface contamination values specified in appendix	NV/YMP RCM 421.2. Material and equipment with fixed contamination levels that exceed the total surface contamination values specified in Table 2-2 may be released for use in Controlled Areas outside of radiological areas only under the following conditions:	NV/YMP RCM 421.2. Material and equipment with fixed contamination levels that exceed the total surface contamination values specified in Table 2-2 may be released for use in Controlled Areas outside of radiological areas only under the following conditions:	Same as Column 3	Same as Column 3	SNL-NV does not release materials and equipment from radiological areas at NTS. This service is provided for SNL by the RSPC.	Same as Column 3	Not applicable. DRI does not release materials and equipment from radiological areas at NTS. This service is provided to DRI by the RSPC.	Not applicable. Release of material and equipment is beyond the scope of WSI/NV radiological control responsibilities.

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D of this part; and (2) The material or equipment is routinely monitored and clearly marked or labeled to alert personnel of the contaminated status.	a. Removable surface contamination levels are below the removable surface contamination values specified in Table 2-2. b. The material or equipment is routinely monitored and clearly marked or labeled to alert personnel of the contaminated status.	a. Removable surface contamination levels are below the removable surface contamination values specified in Table 2-2. b. The material or equipment is routinely monitored and clearly marked or labeled to alert personnel of the contaminated status.						
835.1102 Control of areas 1102(a) Appropriate controls shall be maintained and verified which prevent the inadvertent transfer of removable contamination to locations outside of radiological areas under normal operating conditions.	NV/YMP RCM 337.01. Controls shall be implemented as necessary to prevent the spread of removable contamination outside of radiological areas under normal operating conditions.	NV/YMP RCM 337.01. Controls shall be implemented as necessary to prevent the spread of removable contamination outside of radiological areas under normal operating conditions.	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	Not applicable. WSI/NV does not have any radiological areas under its jurisdiction. WSI/NV will comply with all controls employed by the RSPC or TO who has radiological control responsibilities for an area.

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	NV/YMP RCM 551.1.e. Monitoring of individuals and areas shall be performed to: Verify the effectiveness of engineering and administrative controls in containing radioactive material and reducing radiation exposure.	NV/YMP RCM 551.1.e. Monitoring of individuals and areas shall be performed to: Verify the effectiveness of engineering and administrative controls in containing radioactive material and reducing radiation exposure.						
1102(b) Any area in which contamination levels exceed the values specified in Appendix D of this part shall be controlled in a manner commensurate with the physical and chemical characteristics of the contaminant, the radionuclides present, and the fixed and removable surface contamination levels.	NV/YMP RCM 235. 1. Areas shall be posted to alert personnel to contamination according to Table 2-4 and Article 231. 2. The physical and chemical characteristics of, and the radionuclides present in, the contamination	NV/YMP RCM 235. 1. Areas shall be posted to alert personnel to contamination according to Table 2-4 and Article 231. 2. The physical and chemical characteristics of, and the radionuclides present in, the contamination	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	Not applicable. WSI/NV does not have any radiological areas under its jurisdiction. WSI/NV will comply with all controls employed by the RSPC or TO who has radiological control responsibilities for an area.

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	will be considered in determining the limiting conditions and/or access controls to be specified on the RWP.	will be considered in determining the limiting conditions and/or access controls to be specified on the RWP.						
1102(c) Areas accessible to individuals where the measured total surface contamination levels exceed, but the removable surface contamination levels are less than, corresponding surface contamination values specified in Appendix D of this part, shall be controlled as follows when located outside of radiological areas: (1) The area shall be routinely monitored to ensure the removable surface contamination level remains below the removable surface contamination values specified in Appendix D of this part; and (2)	NV/YMP RCM 222.3.a-b. Areas or items accessible to individuals where the measured total surface contamination levels exceed, but the removable surface contamination levels are less than, corresponding surface contamination values specified in Table 2-2, shall be controlled as follows when located outside of radiological	NV/YMP RCM 222.3.a-b. Areas or items accessible to individuals where the measured total surface contamination levels exceed, but the removable surface contamination levels are less than, corresponding surface contamination values specified in Table 2-2, shall be controlled as follows when located outside of radiological	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	Not applicable. WSI/NV does not have any radiological areas under its jurisdiction. WSI/NV will comply with all controls employed by the RSPC or TO who has radiological control responsibilities for an area.

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The area shall be conspicuously marked to warn individuals of the contaminated status.	areas: a. The area or item shall be routinely monitored to ensure the removable surface contamination level remains below the removable surface contamination values specified in Table 2-2. b. The area or item shall be conspicuously marked to warn individuals of the contaminated status.	areas: a. The area or item shall be routinely monitored to ensure the removable surface contamination level remains below the removable surface contamination values specified in Table 2-2. b. The area or item shall be conspicuously marked to warn individuals of the contaminated status.						
1102(d) Individuals exiting contamination, high contamination, or airborne radioactivity areas shall be monitored, as appropriate, for the presence of surface contamination.	NV/YMP RCM 338.1. Individuals exiting Contamination, High Contamination, or Airborne Radioactivity Areas shall be	NV/YMP RCM 338.1. Individuals exiting Contamination, High Contamination, or Airborne Radioactivity Areas shall be	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	Not applicable. WSI/NV does not have any radiological areas under its jurisdiction. WSI/NV will comply with all controls employed by the

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	monitored, as appropriate, for the presence of surface contamination.	monitored, as appropriate, for the presence of surface contamination.						RSPC or TO who has radiological control responsibilities for an area.
1102(e) Protective clothing shall be required for entry to areas in which removable contamination exists at levels exceeding the removable surface contamination values specified in Appendix D of this part.	NV/YMP RCM 325.1.a-b. Personnel shall wear PC during the following activities: a. Handling of contaminated materials with removable contamination in excess of Table 2-2 levels. b. Work in Contamination, High Contamination, and Airborne Radioactivity Areas.	NV/YMP RCM 325.1.a-b. Personnel shall wear PC during the following activities: a. Handling of contaminated materials with removable contamination in excess of Table 2-2 levels. b. Work in Contamination, High Contamination, and Airborne Radioactivity Areas.	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3 and NV/YMP RCM 325.1.c. As directed by the RCO or as required by the RWP. See also Appendix 3B, Table 3B-1.	Maintaining and verifying appropriate controls, such as use of protective clothing, are beyond the scope of WSI/NV radiological control responsibilities. WSI/NV will comply with all controls employed by the RSPC or TO who has radiological control responsibilities for an area.
Subpart M—Sealed Radioactive Source Control 835.1201 Sealed Radioactive Source Control. Sealed radioactive	NV/YMP RCM 431.01. Sealed radioactive sources shall be used, handled, and stored in a manner commensurate	NV/YMP RCM 431.01. Sealed radioactive sources shall be used, handled, and stored in a manner commensurate	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3

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sources shall be used, handled, and stored in a manner commensurate with the hazards associated with operations involving sources.	with the hazards associated with operations involving the sources.	with the hazards associated with operations involving the sources.						
835.1202 Accountable Sealed Radioactive Sources 1202(a) Each accountable sealed radioactive source shall be inventoried at intervals not to exceed six months. This inventory shall: (1) Establish the physical location of each accountable sealed radioactive source; (2) Verify the presence and adequacy of associated postings and labels; and (3) Establish the adequacy of storage locations, containers, and devices.	NV/YMP RCM 431.2.a. The requirements for inventory and leak testing of accountable sealed sources are: a. Each accountable sealed radioactive source shall be inventoried at intervals not to exceed six months. The inventory shall: (1) Establish the physical location of each accountable sealed radioactive source.	NV/YMP RCM 431.2.a. The requirements for inventory and leak testing of accountable sealed sources are: a. Each accountable sealed radioactive source shall be inventoried at intervals not to exceed six months. The inventory shall: (1) Establish the physical location of each accountable sealed radioactive source.	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	Sealed sources owned by DRI are licensed for use under the UNR Radioactive Material License #16-13-0003-07. See UNR RSM Procedure III: Radiation Source Control Procedures. The RSPC provides inventory services for DRI sealed sources used and stored at the NTS. Copies of these reports are forwarded to the UNR radiation safety office upon receipt.	Not applicable to WSI/NV operations. WSI/NV does not maintain custody of accountable sealed sources used in its operations; therefore, the inventory of accountable sealed radioactive sources is beyond the scope of WSI/NV radiological control responsibilities.

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	(2) Verify the appropriate postings and labels. (3) Establish the adequacy of storage locations, containers, and devices.	(2) Verify the appropriate postings and labels. (3) Establish the adequacy of storage locations, containers, and devices.						
1202(b) Except for sealed radioactive sources consisting solely of gaseous radioactive material or tritium, each accountable sealed radioactive source shall be subject to a source leak test upon receipt, when damage is suspected, and at intervals not to exceed six months. Source leak tests shall be capable of detecting radioactive material leakage equal to or exceeding 0.005 μ Ci.	NV/YMP RCM 431.2.b. The requirements for inventory and leak testing of accountable sealed sources are: b. Except for sealed radioactive sources consisting solely of gaseous radioactive material or tritium, each accountable sealed radioactive source shall be leak tested upon receipt, when	NV/YMP RCM 431.2.b. The requirements for inventory and leak testing of accountable sealed sources are: b. Except for sealed radioactive sources consisting solely of gaseous radioactive material or tritium, each accountable sealed radioactive source shall be leak tested upon receipt, when	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	Sealed sources owned by DRI are licensed for use under the UNR Radioactive Material License #16-13-0003-07. See UNR RSM Procedure XII: Leak Testing Procedure. The RSPC provides leak testing services for DRI sealed sources used and stored at the NTS. Copies of these reports are forwarded to the UNR radiation safety office upon receipt.	Not applicable to WSI/NV operations. WSI/NV does not maintain custody of accountable sealed sources used in its operations; therefore source leak tests are beyond the scope of WSI/NV radiological control responsibilities.

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	damage is suspected and at intervals not to exceed six months. Source leak tests shall be capable of detecting radioactive material leakage = 0.005 μ Ci.	damage is suspected and at intervals not to exceed six months. Source leak tests shall be capable of detecting radioactive material leakage = 0.005 μ Ci.						
1202(c) Notwithstanding the requirements of paragraph (b) of this section, an accountable sealed radioactive source is not subject to periodic source leak testing if that source has been removed from service. Such sources shall be stored in a controlled location, subject to periodic inventory as required by paragraph (a) of this section, and subject to source leak testing prior to being returned to service.	NV/YMP RCM 431.2.c. The requirements for inventory and leak testing of accountable sealed sources are: c. An accountable sealed radioactive source that has been removed from service is not subject to periodic leak testing. It must, however be stored in a controlled location and be	NV/YMP RCM 431.2.c. The requirements for inventory and leak testing of accountable sealed sources are: c. An accountable sealed radioactive source that has been removed from service is not subject to periodic leak testing. It must, however be stored in a controlled location and be	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	Sealed sources owned by DRI are licensed for use under the UNR Radioactive Material License #16-13-0003-07. See UNR RSM Procedure XII: Leak Testing Procedure. The RSPC provides leak testing and inventory services for DRI sealed sources used and stored at the NTS. Copies of these reports are forwarded to the UNR radiation	Not applicable to WSI/NV operations. WSI/NV does not maintain custody of accountable sealed sources used in its operations; therefore, source leak tests are beyond the scope of WSI/NV radiological control responsibilities.

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	inventoried according to Article 431.2.a. An accountable sealed radioactive source must be leak tested before restoring it to service.	inventoried according to Article 431.2.a. An accountable sealed radioactive source must be leak tested before restoring it to service.					safety office upon receipt.	
1202(d) Notwithstanding the requirements of paragraphs (a) and (b) of this section, an accountable sealed radioactive source is not subject to periodic inventory and source leak testing if that source is located in an area that is unsafe for human entry or otherwise inaccessible.	NV/YMP RCM 431.2.d. The requirements for inventory and leak testing of accountable sealed sources are: d. An accountable sealed radioactive source that is located in an area that is unsafe for human entry or is inaccessible is not subject to inventory or leak testing requirements.	NV/YMP RCM 431.2.d. The requirements for inventory and leak testing of accountable sealed sources are: d. An accountable sealed radioactive source that is located in an area that is unsafe for human entry or is inaccessible is not subject to inventory or leak testing requirements.	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	Sealed sources owned by DRI are licensed for use under the UNR Radioactive Material License #16-13-0003-07. See UNR RSM Procedure XII: Leak Testing Procedure.	Not applicable to WSI/NV operations. WSI/NV does not maintain custody of accountable sealed sources used in its operations; therefore, source leak tests are beyond the scope of WSI/NV radiological control responsibilities.
1202(e) An	NV/YMP RCM	NV/YMP RCM	Same as Column	Same as Column	Same as Column	Same as Column	Any sealed	Not applicable to

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accountable sealed radioactive source found to be leaking radioactive material shall be controlled in a manner that minimizes the spread of radioactive contamination.	431.2.e. The requirements for inventory and leak testing of accountable sealed sources are: e. An accountable sealed radioactive source found to be leaking radioactive material at any level of measured contamination shall be controlled in a manner that minimizes the spread of contamination.	431.2.e. The requirements for inventory and leak testing of accountable sealed sources are: e. An accountable sealed radioactive source found to be leaking radioactive material at any level of measured contamination shall be controlled in a manner that minimizes the spread of contamination.	3	3	3	3	source used by DRI fall under the UNR Radioactive Material License #16-13-0003-07. The RSPC provides leak testing services for DRI. Any sealed source found to be leaking must be immediately reported to the UNR RSO, who will make the required notifications to the state and will deal with the situation per UNR RSM Procedure XII: Leak Testing Procedure.	WSI/NV operations. WSI/NV does not maintain custody of accountable sealed sources used in its operations; therefore, source leak tests are beyond the scope of WSI/NV radiological control responsibilities.
Subpart N-- Emergency Exposure Situations 835.1301 General provisions.	NV/YMP RCM 213.5. A general employee whose occupational dose has exceeded any of the limits	Revise a.: NV/YMP RCM 213.5. A general employee whose occupational dose has exceeded any of	Operations which could potentially require emergency exposures to personnel in excess of the	This is outside the scope of the LANL/NTS Radiological Control Program. Operations which could potentially	Same as Column 3	Same as Column 3	Not applicable to DRI. Operations which could potentially require emergency exposures to	WSI/NV does not have a procedure for emergency exposure situations. In the unlikely event

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1301(a) A general employee whose occupational dose has exceeded the numerical value of any of the limits specified in §835.202 as a result of an authorized emergency exposure may be permitted to return to work in radiological areas during the current year providing that all of the following conditions are met: (1) Approval is first obtained from the contractor management and the Head of the responsible DOE field organization; (2) The individual receives counseling from radiological protection and medical personnel regarding the consequences of receiving additional occupational exposure during the year; and (3) The affected	specified in Table 2-1 or Appendix 2C, Table 2C-1, as a result of an authorized emergency exposure may be permitted to return to work in radiological areas during the current year providing that all of the following conditions are met: a. Approval is first obtained from the TO SSE and the NNSA/NSO or YMORD Manager. b. The individual receives counseling from radiological protection and medical personnel regarding the consequences of	the limits specified in Table 2-1 or Appendix 2C, Table 2C-1, as a result of an authorized emergency exposure may be permitted to return to work in radiological areas during the current year providing that all of the following conditions are met: a. Approval is first obtained from the TO SSE and the NNSA/NSO or OCRWM Manager. b. The individual receives counseling from radiological protection and medical personnel regarding the	835.202, Occupational Exposure Limits, are outside the scope of LLNL activities. The activities and radioactive materials do not present an opportunity for an emergency situation in which the radiological hazards could not be mitigated by engineering controls or personal protective equipment sufficient to avoid the requirement for individual exposures in excess of the 835.202 Occupational Exposure Limits.	require emergency exposures to personnel in excess of the 835.202, Occupational Exposure Limits, are outside the scope of LANL/NTS activities. The activities and radioactive materials do not present an opportunity for an emergency situation in which the radiological hazards could not be mitigated by engineering controls or personal protective equipment sufficient to avoid the requirement for individual exposures in excess of the 835.202			personnel in excess of the 835.202, Occupational Exposure Limits, are outside the scope of DRI activities. The activities and radioactive materials do not present an opportunity for an emergency situation in which the radiological hazards could not be mitigated by engineering controls or personal protective equipment sufficient to avoid the requirement for individual exposures in excess of the 835.202 Occupational Exposure Limits.	that this situation did occur, WSI/NV would follow the requirements in NV/YMP RCM 213.5.

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employee agrees to return to radiological work.	receiving additional occupational exposure during the year. c. The affected employee agrees to return to radiological work.	consequences of receiving additional occupational exposure during the year. c. The affected employee agrees to return to radiological work.		Occupational Exposure Limits.				
1301(b) All doses exceeding the limits specified in §835.202 shall be recorded in the affected individual's occupation dose record.	NV/YMP RCM 722.1.01. Records of doses received by all individuals for whom individual monitoring was performed shall be recorded in the individual's occupational dose record and shall be maintained by the RSPC.	NV/YMP RCM 722.1.01. Records of doses received by all individuals for whom individual monitoring was performed shall be recorded in the individual's occupational dose record and shall be maintained by the RSPC.	Operations which could potentially require emergency exposures to personnel in excess of the 835.202, Occupational Exposure Limits, are outside the scope of LLNL activities. The activities and radioactive materials do not present an opportunity for an emergency situation in which the radiological hazards could not be mitigated	This is outside the scope of the LANL/NTS Radiological Control Program. Operations which could potentially require emergency exposures to personnel in excess of the 835.202, Occupational Exposure Limits, are outside the scope of LANL/NTS activities. The activities and radioactive materials do not present an	These records shall be maintained by the dosimetry records section in Albuquerque.	Records generated by the RSPC for services provided to SNJV are maintained by the RSPC. NV/YMP RCM 141.3.e. The RSPC shall provide the following: e. External and internal dosimetry services.	Not applicable to DRI. Operations which could potentially require emergency exposures to personnel in excess of the 835.202, Occupational Exposure Limits, are outside the scope of DRI activities. The activities and radioactive materials do not present an opportunity for an emergency situation in which the radiological	By written agreement, the RSPC provides dosimetry services to WSI/NV and maintains dosimetry records generated from these services.

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			by engineering controls or personal protective equipment sufficient to avoid the requirement for individual exposures in excess of the 835.202 Occupational Exposure Limits.	opportunity for an emergency situation in which the radiological hazards could not be mitigated by engineering controls or personal protective equipment sufficient to avoid the requirement for individual exposures in excess of the 835.202 Occupational Exposure Limits.			hazards could not be mitigated by engineering controls or personal protective equipment sufficient to avoid the requirement for individual exposures in excess of the 835.202 Occupational Exposure Limits.	
1301(c) When the conditions under which a dose was received in excess of the limits specified in §835.202, except those doses received in accordance with §835.204, have been eliminated, operating management shall notify the Head of the responsible DOE field organization.	NV/YMP RCM Appendix 2A, Table 2A-1 Note: 3.01. When the conditions under which a dose was received in excess of the limits specified in 10 CFR 835.202 have been eliminated, operating management	Revise: NV/YMP RCM Appendix 2A, Table 2A-1 Note: 3.01. When the conditions under which a dose was received in excess of the limits specified in 10 CFR 835.202 have been eliminated, operating	Operations which could potentially require emergency exposures to personnel in excess of the 835.202, Occupational Exposure Limits, are outside the scope of LLNL activities. The activities and	This is outside the scope of the LANL/NTS Radiological Control Program. Operations which could potentially require emergency exposures to personnel in excess of the 835.202, Occupational	Same as Column 3	Same as Column 3	Not applicable to DRI. Operations which could potentially require emergency exposures to personnel in excess of the 835.202, Occupational Exposure Limits, are outside the scope of DRI	Not applicable to WSI/NV operations. Operations which could potentially require emergency exposures to personnel in excess of the 835.202, Occupational Exposure Limits, are outside the

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	shall notify the NNSA/NSO or YMORD Manager.	management shall notify the NNSA/NSO or OCRWM Manager.	radioactive materials do not present an opportunity for an emergency situation in which the radiological hazards could not be mitigated by engineering controls or personal protective equipment sufficient to avoid the requirement for individual exposures in excess of the 835.202 Occupational Exposure Limits.	Exposure Limits, are outside the scope of LANL/NTS activities. The activities and radioactive materials do not present an opportunity for an emergency situation in which the radiological hazards could not be mitigated by engineering controls or personal protective equipment sufficient to avoid the requirement for individual exposures in excess of the 835.202 Occupational Exposure Limits.			activities. The activities and radioactive materials do not present an opportunity for an emergency situation in which the radiological hazards could not be mitigated by engineering controls or personal protective equipment sufficient to avoid the requirement for individual exposures in excess of the 835.202 Occupational Exposure Limits.	scope of WSI/NV activities.
1301(d) Operations which have been suspended as a result of a dose in excess of the limits specified in	NV/YMP RCM Appendix 2-A, Table 2A-1 Notes: 3.02. Operations after	Revise: NV/YMP RCM Appendix 2-A, Table 2A-1 Notes: 3.02. Operations which	Operations which could potentially require emergency exposures to	This is outside the scope of the LANL/NTS Radiological Control Program.	Same as Column 3	Same as Column 3	Not applicable to DRI. Operations which could potentially require	Not applicable to WSI/NV operations. Operations which could potentially

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§835.202, except those received in accordance with §835.204, may be resumed only with the approval of the DOE.	a dose was received in excess of the limits specified in 10 CFR 835.202 may be resumed only with the approval of NNSA/NSO.	have been suspended as a result of a dose in excess of the limits specified in RCM Table 2-1 may be resumed only with the approval of NNSA/NSO.	personnel in excess of the 835.202, Occupational Exposure Limits, are outside the scope of LLNL-N activities. The activities and radioactive materials do not present an opportunity for an emergency situation in which the radiological hazards could not be mitigated by engineering controls or personal protective equipment sufficient to avoid the requirement for individual exposures in excess of the 835.202 Occupational Exposure Limits.	Operations which could potentially require emergency exposures to personnel in excess of the 835.202, Occupational Exposure Limits, are outside the scope of LANL/NTS activities. The activities and radioactive materials do not present an opportunity for an emergency situation in which the radiological hazards could not be mitigated by engineering controls or personal protective equipment sufficient to avoid the requirement for individual exposures in			emergency exposures to personnel in excess of the 835.202, Occupational Exposure Limits, are outside the scope of DRI activities. The activities and radioactive materials do not present an opportunity for an emergency situation in which the radiological hazards could not be mitigated by engineering controls or personal protective equipment sufficient to avoid the requirement for individual exposures in excess of the 835.202 Occupational Exposure Limits.	require emergency exposures to personnel in excess of the limits specified in 835.202, Occupational Exposure Limits, are outside the scope of WSI/NV activities.

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				excess of the 835.202 Occupational Exposure Limits.				
835.1302 Emergency exposure situations. 1302(a) The risk of injury to those individuals involved in rescue and recovery operations shall be minimized.	NV/YMP RCM 213.4.02.a. For compliance with 10 CFR 835.1302, in emergency exposure situations the following must apply: a. The risk of injury to those individuals involved in rescue and recovery operations shall be minimized.	NV/YMP RCM 213.4.02.a. For compliance with 10 CFR 835.1302, in emergency exposure situations the following must apply: a. The risk of injury to those individuals involved in rescue and recovery operations shall be minimized.	Operations which could potentially require emergency exposures to personnel in excess of the 835.202, Occupational Exposure Limits, are outside the scope of LLNL-N activities. The activities and radioactive materials do not present an opportunity for an emergency situation in which the radiological hazards could not be mitigated by engineering controls or personal protective equipment	This is outside the scope of the LANL/NTS Radiological Control Program. Operations which could potentially require emergency exposures to personnel in excess of the 835.202, Occupational Exposure Limits, are outside the scope of LANL/NTS activities. The activities and radioactive materials do not present an opportunity for an emergency situation in which the radiological hazards could	There are currently no operations being performed at SNL/NTS facilities, operations, or processes wherein emergency exposures to personnel in excess of 835.202 occupational dose limits can be envisioned. SNL Radiological Protection Procedures Manual, MN 471016, Chapter 11, Radiological Incidents, Section 4.12 "Emergency Exposure Situations"	Not Applicable. Operations which could potentially require emergency exposures to personnel in excess of the 835.202, Occupational Exposure Limits, are outside the scope of SNJV activities. SNJV will not conduct activities which could result such emergency operations without revision and subsequent approval of this RPP.	Not applicable to DRI. Operations which could potentially require emergency exposures to personnel in excess of the 835.202, Occupational Exposure Limits, are outside the scope of DRI activities. The activities and radioactive materials do not present an opportunity for an emergency situation in which the radiological hazards could not be mitigated by engineering controls or personal	Not applicable to WSI/NV operations. WSI/NV has a contractual agreement with NNSA/NSO that precludes rescue and recovery activities, or other activities that may result in emergency exposure situations. Rescue and recovery operations for security related incidents are delegated to the Federal Bureau of Investigation through a Memorandum of Agreement.

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	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference
			sufficient to avoid the requirement for individual exposures in excess of the 835.202 Occupational Exposure Limits.	not be mitigated by engineering controls or personal protective equipment sufficient to avoid the requirement for individual exposures in excess of the 835.202 Occupational Exposure Limits.	implements the requirements of §835.1302.		protective equipment sufficient to avoid the requirement for individual exposures in excess of the 835.202 Occupational Exposure Limits.	
1302 (b) Operating management shall weigh actual and potential risks against the benefits to be gained.	NV/YMP RCM 213.4.02.b. For compliance with 10 CFR 835.1302, in emergency exposure situations the following must apply: b. Operating management shall weigh actual and potential risks against the benefits to be gained.	NV/YMP RCM 213.4.02.b. For compliance with 10 CFR 835.1302, in emergency exposure situations the following must apply: b. Operating management shall weigh actual and potential risks against the benefits to be gained.	Operations which could potentially require emergency exposures to personnel in excess of the 835.202, Occupational Exposure Limits, are outside the scope of LLNL-NTS activities. The activities and radioactive materials do not present an opportunity for an emergency	This is outside the scope of the LANL/NTS Radiological Control Program. Operations which could potentially require emergency exposures to personnel in excess of the 835.202, Occupational Exposure Limits, are outside the scope of LANL/NTS activities. The	There are currently no operations being performed at SNL/NTS facilities, operations or processes wherein emergency exposures to personnel in excess of 835.202 occupational dose limits can be envisioned. SNL Radiological Protection	Not Applicable. Operations which could potentially require emergency exposures to personnel in excess of the 835.202, Occupational Exposure Limits, are outside the scope of SNJV activities. SNJV will not conduct activities which could result such emergency operations	Not applicable to DRI. Operations which could potentially require emergency exposures to personnel in excess of the 835.202, Occupational Exposure Limits, are outside the scope of DRI activities. The activities and radioactive materials do not present an	Not applicable to WSI/NV operations. WSI/NV has a contractual agreement with DOE/NV that precludes rescue and recovery activities, or other activities that may result in emergency exposure situations. Rescue and recovery operations for security related

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10 CFR 835	NV/YMP RCM Rev 5 and NTS RPP Revision 0	NSTec Appendix A	LLNL Appendix B	LANL Appendix C	SNL Appendix D	SNJV Appendix E	DRI Appendix F	WSI Appendix G
	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference
			situation in which the radiological hazards could not be mitigated by engineering controls or personal protective equipment sufficient to avoid the requirement for individual exposures in excess of the 835.202 Occupational Exposure Limits.	activities and radioactive materials do not present an opportunity for an emergency situation in which the radiological hazards could not be mitigated by engineering controls or personal protective equipment sufficient to avoid the requirement for individual exposures in excess of the 835.202 Occupational Exposure Limits.	Procedures Manual, MN 471016, Chapter 11, Radiological Incidents, Section 4.12 "Emergency Exposure Situations" implements the requirements of §835.1302.	without revision and subsequent approval of this RPP.	opportunity for an emergency situation in which the radiological hazards could not be mitigated by engineering controls or personal protective equipment sufficient to avoid the requirement for individual exposures in excess of the 835.202 Occupational Exposure Limits.	incidents are delegated to the Federal Bureau of Investigation through a Memorandum of Agreement.
1302 (c) No individual shall be required to perform rescue action that might involve substantial personal risk.	NV/YMP RCM 213.4.02.c. For compliance with 10 CFR 835.1302, in emergency exposure situations the following must apply:	NV/YMP RCM 213.4.02.c. For compliance with 10 CFR 835.1302, in emergency exposure situations the following must apply:	Operations which could potentially require emergency exposures to personnel in excess of the 835.202, Occupational Exposure Limits,	This is outside the scope of the LANL/NTS Radiological Control Program. Operations which could potentially require emergency exposures to	There are currently no operations being performed at SNL/NTS facilities, operations or processes wherein emergency	Not Applicable. Operations which could potentially require emergency exposures to personnel in excess of the 835.202, Occupational	Not applicable to DRI. Operations which could potentially require emergency exposures to personnel in excess of the 835.202,	Not applicable to WSI/NV operations. WSI/NV has a contractual agreement with DOE/NV that precludes rescue and recovery activities, or

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	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference
	c. No individual shall be required to perform rescue action that might involve substantial personal risk.	c. No individual shall be required to perform rescue action that might involve substantial personal risk.	are outside the scope of LLNL-N activities. The activities and radioactive materials do not present an opportunity for an emergency situation in which the radiological hazards could not be mitigated by engineering controls or personal protective equipment sufficient to avoid the requirement for individual exposures in excess of the 835.202 Occupational Exposure Limits.	personnel in excess of the 835.202, Occupational Exposure Limits, are outside the scope of LANL/NTS activities. The activities and radioactive materials do not present an opportunity for an emergency situation in which the radiological hazards could not be mitigated by engineering controls or personal protective equipment sufficient to avoid the requirement for individual exposures in excess of the 835.202 Occupational Exposure Limits.	exposures to personnel in excess of 835.202 occupational dose limits can be envisioned. SNL Radiological Protection Procedures Manual, MN 471016, Chapter 11, Radiological Incidents, Section 4.12 "Emergency Exposure Situations" implements the requirements of §835.1302.	Exposure Limits, are outside the scope of SNJV activities. SNJV will not conduct activities which could result such emergency operations without revision and subsequent approval of this RPP.	Occupational Exposure Limits, are outside the scope of DRI activities. The activities and radioactive materials do not present an opportunity for an emergency situation in which the radiological hazards could not be mitigated by engineering controls or personal protective equipment sufficient to avoid the requirement for individual exposures in excess of the 835.202 Occupational Exposure Limits.	other activities that may result in emergency exposure situations. Rescue and recovery operations for security related incidents are delegated to the Federal Bureau of Investigation through a Memorandum of Agreement.
1302(d) Each	NV/YMP RCM	NV/YMP RCM	Operations which	This is outside	In the extremely	Not Applicable.	Cross reference	Not applicable to

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	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference
individual authorized to perform emergency actions likely to result in occupational doses exceeding the values of the limits provided at §835.202(a) shall be trained in accordance with §835.901(b) and briefed beforehand on the known or anticipated hazards to which the individual will be subjected.	213.4.d. For compliance with 10 CFR 835.1302, in emergency exposure situations the following must apply: d. Each individual authorized to perform emergency actions likely to result in occupational doses exceeding the values of the limits provided in 10 CFR 835.202(a) shall be trained according to 10 CFR 835.901.b and briefed beforehand on the known or anticipated hazards to which the individual will be subjected.	213.4.d. For compliance with 10 CFR 835.1302, in emergency exposure situations the following must apply: d. Each individual authorized to perform emergency actions likely to result in occupational doses exceeding the values of the limits provided in 10 CFR 835.202(a) shall be trained according to 10 CFR 835.901.b and briefed beforehand on the known or anticipated hazards to which the individual will be subjected.	could potentially require emergency exposures to personnel in excess of the 835.202, Occupational Exposure Limits, are outside the scope of LLNL-N activities. The activities and radioactive materials do not present an opportunity for an emergency situation in which the radiological hazards could not be mitigated by engineering controls or personal protective equipment sufficient to avoid the requirement for individual exposures in excess of the 835.202	the scope of the LANL/NTS Radiological Control Program. Operations which could potentially require emergency exposures to personnel in excess of the 835.202, Occupational Exposure Limits, are outside the scope of LANL/NTS activities. The activities and radioactive materials do not present an opportunity for an emergency situation in which the radiological hazards could not be mitigated by engineering controls or personal protective equipment	unlikely case that an SNL-NV employee should be exposed to high levels of radiation during an emergency, that individual shall have been trained at the Radiation Worker II level and shall be briefed beforehand on the known or anticipated hazards to which the individual will be subjected. Such rescue and recovery action shall be performed by volunteers.	Operations which could potentially require emergency exposures to personnel in excess of the 835.202, Occupational Exposure Limits, are outside the scope of SNJV activities. SNJV will not conduct activities which could result such emergency operations without revision and subsequent approval of this RPP.	NV/YMP RCM 213.4.d. Not applicable to DRI. Operations which could potentially require emergency exposures to personnel in excess of the 835.202, Occupational Exposure Limits, are outside the scope of DRI activities. The activities and radioactive materials do not present an opportunity for an emergency situation in which the radiological hazards could not be mitigated by engineering controls or personal protective equipment	WSI/NV operations.

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	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference
			Occupational Exposure Limits.	sufficient to avoid the requirement for individual exposures in excess of the 835.202 Occupational Exposure Limits.			sufficient to avoid the requirement for individual exposures in excess of the 835.202 Occupational Exposure Limits.	
835.1303 [Reserved]								
835.1304 Nuclear accident dosimetry. 1304(a) Installations possessing sufficient quantities of fissile material to potentially constitute a critical mass, such that the excessive exposure of individuals to radiation from a nuclear accident is possible, shall provide nuclear accident dosimetry for those individuals.	There is no identifiable credible criticality accident scenario for NSTec operations. Therefore, there is currently no requirement for a Nuclear Accident Dosimetry system when a credible criticality accident scenario does not exist. The RSPC is developing a nuclear accident dosimetry	There is no identifiable credible criticality accident scenario for NSTec operations. Therefore, there is currently no requirement for a Nuclear Accident Dosimetry system when a credible criticality accident scenario does not exist. The RSPC is developing a nuclear accident dosimetry	Same as Column 3	Same as Column 3	No contractor commitment required. The RSPC provides nuclear accident dosimetry.	No contractor commitment required. The RSPC provides nuclear accident dosimetry.	No contractor commitment required. The RSPC provides nuclear accident dosimetry.	No contractor commitment required. The RSPC provides nuclear accident dosimetry.

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10 CFR 835	NV/YMP RCM Rev 5 and NTS RPP Revision 0	NSTec Appendix A	LLNL Appendix B	LANL Appendix C	SNL Appendix D	SNJV Appendix E	DRI Appendix F	WSI Appendix G
	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference
	program that will be in place if needed for the Criticality Experiments Facility.	program that will be in place if needed for the Criticality Experiments Facility.						
1304(b) Nuclear accident dosimetry shall include the following: (1) A method to conduct initial screening of individuals involved in a nuclear accident to determine whether significant exposures to radiation occurred; (2) Methods and equipment for analysis of biological materials; (3) A system of fixed nuclear accident dosimeter units; and (4) Personal nuclear accident dosimeters.	NV/YMP RCM 515.2. Nuclear accident dosimetry shall include the following: a. A method to conduct initial screening of individuals involved in a nuclear accident to determine whether significant exposures to radiation occurred b. Methods and equipment for analysis of biological materials; c. A system of fixed nuclear accident dosimeter units;	NV/YMP RCM 515.2. Nuclear accident dosimetry shall include the following: a. A method to conduct initial screening of individuals involved in a nuclear accident to determine whether significant exposures to radiation occurred b. Methods and equipment for analysis of biological materials; c. A system of fixed nuclear accident dosimeter units;	No contractor commitment required. The RSPC will provide nuclear accident dosimetry as necessary.	No contractor commitment required. The RSPC will provide nuclear accident dosimetry as necessary.	No contractor commitment required. The RSPC will provide nuclear accident dosimetry as necessary.	No contractor commitment required. The RSPC provides nuclear accident dosimetry.	No contractor commitment required. The RSPC will provide nuclear accident dosimetry as necessary.	No contractor commitment required. The RSPC will provide nuclear accident dosimetry as necessary.

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	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference
	and d. A method to ensure that personal nuclear accident dosimeters are worn by all individuals who enter locations in which installed criticality alarm systems are required.	and d. A method to ensure that personal nuclear accident dosimeters are worn by all individuals who enter locations in which installed criticality alarm systems are required.						
Appendix A to Part 835--Derived Air Concentrations (DAC) for Controlling Radiation Exposures to Workers at DOE Facilities. The data presented in appendix A are to be used for controlling individual internal doses in accordance with §835.209, identifying the need for air monitoring in accordance with §835.403, and identifying and posting airborne radioactivity	NV/YMP RCM 223.1. The data presented in 10 CFR 835 Appendix A, "Derived Air Concentrations (DACs) for Controlling Radiation Exposure to Workers at DOE Facilities," are to be used for controlling individual internal doses according to 10 CFR 835.209, identifying the	Revise: NV/YMP RCM 223.1. The data presented in 10 CFR 835 Appendix A, "Derived Air Concentrations (DAC) for Controlling Radiation Exposure to Workers at DOE Facilities," are to be used for controlling individual internal doses and 10 CFR 835 Appendix C, "Derived Air	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3 and Identifying the need for air monitoring and identifying and posting airborne radioactivity areas are beyond the scope of WSI/NV operations.

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	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference
<p>areas in accordance with §835.603(d). The DAC values are given for individual radionuclides. For known mixtures of radionuclides, determine the sum of the ratio of the observed concentration of a particular radionuclide and its corresponding DAC for all radionuclides in the mixture. If this sum exceeds unity (1), then DAC has been exceeded. For unknown radionuclides, the most restrictive DAC (lowest value) for those isotopes not known to be absent shall be used. For any single radionuclide not listed in appendix A with decay mode other than alpha emission or spontaneous fission and with radioactive half-life greater than</p>	<p>need for air monitoring according to 10 CFR 835.403, and identifying and Airborne Radioactivity Areas according to 10 CFR 835.603(d).</p> <p>NV/YMP RCM 223.3. For known mixtures of radionuclides, the sum of the ratio of the observed concentration of a particular radionuclide and its corresponding DAC, for all radionuclides in the mixture, must not exceed 1.0. For unknown radionuclides, the most restrictive DAC (lowest value) for those isotopes not known to be</p>	<p>Concentrations (DAC) for Workers From External Exposure During Immersion in a Cloud of Airborne Radioactive Material,” are to be used for controlling individual external doses according to 10 CFR 835.209, identifying the need for air monitoring according to 10 CFR 835.403, and identifying and Airborne Radioactivity Areas according to 10 CFR 835.603(d).</p> <p>Revise: NV/YMP RCM 223.3. For known mixtures of radionuclides, the sum of the</p>						

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<p>two hours, the DAC value shall be 4 E-11 $\mu\text{Ci/mL}$ (1 Bq/m³). For any single radionuclide not listed in appendix A that decays by alpha emission or spontaneous fission the DAC value shall be 2 E-13 $\mu\text{Ci/mL}$ (8 E-03 Bq/m³).</p> <p>The DACs for limiting radiation exposures through inhalation of radionuclides by workers are listed in this appendix. The values are based on either a stochastic (committed effective dose) dose limit of 5 rems (0.05 Sv) or a deterministic (organ or tissue) dose limit of 50 rems (0.05 Sv) per year, whichever is more limiting.</p> <p>Note: The 15 rems (0.15 Sv) dose limit for the lens of the eye does not appear as a</p>	absent shall be used.	ratio of the observed concentration of a particular radionuclide and its corresponding DAC, for all radionuclides in the mixture, must not exceed 1.0. For unknown radionuclides, the most restrictive DAC (lowest value) for those isotopes not known to be absent shall be used. For any single radionuclide not listed in Appendix A with decay mode other than alpha emission or spontaneous fission and with radioactive half-life greater than two hours, the DAC value shall be 4 E-11						

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critical organ dose limit. The columns in this appendix contain the following information: (1) Radionuclide; (2) inhaled air DAC for type F (fast) type M (moderate), and type S (slow) materials in units of $\mu\text{Ci/mL}$; (3) inhaled air DAC for type F (fast) type M (moderate), and type S (slow) materials in units of Bq/m^3 ; (4) an indication of whether or not the DAC for each class is controlled by the stochastic (effective dose) or deterministic (organ or tissue) dose. The absorption types (F, M, and S) have been established to describe the absorption type of the materials from the respiratory tract into the blood— The range of half-times the		$\mu\text{Ci/mL}$ (1 Bq/m^3). For any single radionuclide not listed in Appendix A that decays by alpha emission or spontaneous fission, the DAC value shall be $2 \times 10^{-13} \mu\text{Ci/mL}$ ($8 \times 10^{-3} \text{Bq/m}^3$).						

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absorption types correspond to: Type F, 100% at 10 minutes; Type M, 10% at 10 minutes and 90% at 140 days; and Type S, 0.1% at 10 minutes and 99.9% at 7000 days. The DACs are listed by radionuclide, in order of increasing atomic mass, and are based on the assumption that the particle size distribution 5 micrometers AMAD is used. For situations where the particle size distribution is known to differ significantly from 5 micrometers AMAD, appropriate corrections may be made to both the estimated dose to workers and the DACs.								
APPENDIX B TO PART 835 [RESERVED]								
Appendix C- to Part 835—Derived Air	Currently, not applicable to	Revise: NV/YMP RCM 223.1. The	Currently, not applicable to	Currently, not applicable to	Currently, not applicable to	Currently, not applicable to	Currently, not applicable to DRI	Currently, not applicable to

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Concentrations (DAC) for Workers From External Exposure During Immersion in a Cloud of Airborne Radioactive Material a. The data presented in Appendix C are to be used for controlling occupational exposures in accordance with §835.209, identifying the need for air monitoring in accordance with §835.403 and identifying the need for posting of airborne radioactivity areas in accordance with §835.603(d). b. The air immersion DAC values shown in this appendix are based on the stochastic dose limit of 5 rems (0.05 sievert) per year. Four columns of information	NSTec Operations at the NTS.	data presented in 10 CFR 835 Appendix A, "Derived Air Concentrations (DAC) for Controlling Radiation Exposure to Workers at DOE Facilities," are to be used for controlling individual internal doses and 10 CFR 835 Appendix C, "Derived Air Concentrations (DAC) for Workers From External Exposure During Immersion in a Cloud of Airborne Radioactive Material," are to be used for controlling individual external doses according to 10	LLNL-N Operations.	LANL/NTS Operations.	SNL Operations at the NTS.	SNJV Operations at the NTS.	Operations at the NTS.	WSI/NV Operations at the NTS.
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<p>are presented: (1) radionuclide; (2) half-life in units of seconds (s), minutes (min), hours (h), days (d), or years (yr); (3) air immersion DAC in units of $\mu\text{Ci/ml}$; and (4) air immersion DAC in units of Bq/m^3. The data are listed by radionuclide in order of increasing atomic mass. The air immersion DACs were calculated for a continuous, nonshielded exposure via immersion in a semi-infinite cloud of airborne radioactive material. The DACs listed in this appendix may be modified to allow for submersion in a cloud of finite dimensions.</p> <p>c. The DAC values are given for individual radionuclides. For known mixtures of radionuclides,</p>		<p>CFR 835.209, identifying the need for air monitoring according to 10 CFR 835.403, and identifying and Airborne Radioactivity Areas according to 10 CFR 835.603(d).</p> <p>NV/YMP RCM 223.2.a. Airborne Radioactivity Area means any area, accessible to individuals, where either: a. The concentration of airborne radioactivity, above natural background, exceeds or is likely to exceed the DAC values listed in 10 CFR 835 Appendix A or Appendix C.</p>						

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determine the sum of the ratio of the observed concentration of a particular radionuclide and its corresponding DAC for all radionuclides in the mixture. If this sum exceeds unity (1), then the DAC has been exceeded. For unknown radionuclides, the most restrictive DAC (lowest value) for those isotopes not known to be absent shall be used.		Revise: NV/YMP RCM 223.3.01-02. For known mixtures of radionuclides, the sum of the ratio of the observed concentration of a particular radionuclide and its corresponding DAC, for all radionuclides in the mixture, must not exceed 1.0. For unknown radionuclides, the most restrictive DAC (lowest value) for those isotopes not known to be absent shall be used.						
Appendix D to Part 835-Surface Contamination Values. The data presented in Appendix D are to be	NV/YMP RCM Table 2-2, Columns 1-3.	Revise: NV/YMP RCM Table 2-2 Footnote 6 ⁶ Tritium contamination may diffuse into	Same as Column 3	Same as Column 3	Same as Column 3	Same as Column 3	No Contractor Commitment Required. The RSPC provides this service.	By written agreement, the RSPC provides this service to WSI/NV.

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<p>used for identifying and posting contamination and high contamination areas in accordance with §835.603(e) and (f) and identifying the need for surface contamination monitoring and control in accordance with §§835.1101 and 1102.</p> <p>The Table for Surface Contamination Values in dpm/100cm² remain the same except for Tritium and STCs Total (Fixed + Removable) column and the addition to Footnote 6.</p> <p>⁶ Tritium contamination may diffuse into the volume or matrix of materials. Evaluation of surface contamination shall consider the extent to which such contamination may migrate to the surface</p>		<p>the volume or matrix of materials. Evaluation of surface contamination shall consider the extent to which such contamination may migrate to the surface in order to ensure the surface contamination value provided in this appendix is not exceeded. Once this contamination migrates to the surface, it may be removable, not fixed; therefore, a "Total" value does not apply. In certain cases, a "Total" value of 10,000 dpm/100 cm² may be applicable either to metals of the</p>						

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<p>in order to ensure the surface contamination value provided in this appendix is not exceeded. Once this contamination migrates to the surface, it may be removable, not fixed; therefore, a "Total" value does not apply. In certain cases, a "Total" value of 10,000 dpm/100 cm² may be applicable either to metals of the types from which insoluble special tritium compounds are formed, that have been exposed to tritium, or to bulk materials to which insoluble special tritium compound particles are fixed to a surface.</p> <p>⁷ (alpha) These limits apply only to the alpha emitters within the respective decay series.</p>		<p>types from which insoluble special tritium compounds are formed, that have been exposed to tritium, or to bulk materials to which insoluble special tritium compound particles are fixed to a surface.</p> <p>Add: Footnote 7 reference in Uranium Row of Table 2-2</p> <p>Add: NV/YMP RCM Table 2-2 Footnote 7: ⁷ (alpha) These limits apply only to the alpha emitters within the respective decay series.</p>						
Appendix E - Values	NV/YMP RCM	Revise: NV/YMP	Same as Column	Same as Column	Same as Column	Same as Column	DRI sealed	Not applicable to

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for Establishing Sealed Radioactive Source Accountability and Radioactive Material Posting and Labeling Requirements. The data presented in Appendix E are to be used for identifying accountable sealed radioactive sources and radioactive material areas as those terms are defined at §835.2(a), establishing the need for radioactive material area posting in accordance with §835.603(g), and establishing the need for radioactive material labeling in accordance with §835.605. Any alpha emitting radionuclide not listed in appendix E and mixtures of alpha emitters of unknown composition have a	Table 4A	RCM Appendix 4A with new Accountability values. Revise: NV/YMP RCM Appendix 4A – Footnote 2 With the exception that any type of STC has a value of 10 Ci, any radionuclide other than alpha emitting radionuclides not listed in Appendix 4A and mixtures of beta emitters of unknown composition have a value of 100 µCi.	3	3	3	3	sources fall under the requirements of the UNR Radioactive Material License #16-13-0003-07; however, DRI does not participate in the source accountability inventory at the NTS via the services provided by the RSPC.	WSI/NV operations. WSI/NV is not a sealed source custodian.

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10 CFR 835	NV/YMP RCM Rev 5 and NTS RPP Revision 0	NSTec Appendix A	LLNL Appendix B	LANL Appendix C	SNL Appendix D	SNJV Appendix E	DRI Appendix F	WSI Appendix G
	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference

<p>value of 10 μCi.</p> <p>With the exception that any type of STC has a value of 10 Ci, any radionuclide other than alpha emitting radionuclides not listed in appendix E and mixtures of beta emitters of unknown composition have a value of 100 μCi.</p> <p>Note: Where there is involved a mixture of radionuclides in known amounts, derive the value for the mixture as follows: determine, for each radionuclide in the mixture, the ratio between the quantity present in the mixture and the value otherwise established for the specific radionuclide when not in the mixture. If the sum of such ratios for all radionuclides in the mixture exceeds unity (1), then the</p>								
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NEVADA TEST SITE RADIATION PROTECTION PROGRAM

APPENDIX H COMPLIANCE DEMONSTRATION TABLE

10 CFR 835	NV/YMP RCM Rev 5 and NTS RPP Revision 0	NSTec Appendix A	LLNL Appendix B	LANL Appendix C	SNL Appendix D	SNJV Appendix E	DRI Appendix F	WSI Appendix G
	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference	Implementation Reference
accountability criterion has been exceeded.								