

**SALT WASTE PROCESSING FACILITY**

**RADIATION PROTECTION PROGRAM  
FOR 10 CFR 835  
(OCCUPATIONAL RADIATION PROTECTION)**

**Contract No. DE-AC09-02SR22210**

**Function: Radiation Protection**  
**Doc. No.: S-CIP-J-00004**  
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SIGNATURE PAGE

  
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**SUMMARY OF CHANGES**

<b>Revision No.</b>	<b>Date</b>	<b>Description of Change</b>
0	08/31/06	Issued for Approval
1	01/30/07	Issued for Approval
2	01/14/08	Issued as Approved
3	02/11/08	Issued as Approved
3A1	06/14/2016	Revise per DMR-3516. Issued for Intradiscipline Check.
3A2	06/14/2016	Revise per DMR-3516. Issued for Interdiscipline Review.
4	08/18/2016	Revise per DMR-3516. Issued for Approval.
4A1	01/18/2017	Revise per DMR-3694. Issued for Intradiscipline Check.
4A2	01/18/2017	Revise per DMR-3694. Issued for Interdiscipline Review.
5 Verification	01/20/2017	Revise per DMR-3694. Issued for DOE Verification.
5	02/02/2017	Revise per DMR-3694. Issued as Approved.

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**LIST OF ACRONYMS AND ABBREVIATIONS**

ALARA	As Low As Reasonably Achievable
Bq	Becquerel
CFR	Code of Federal Regulations
DAC	derived air concentration
DOE	U.S. Department of Energy
DOELAP	DOE Laboratory Accreditation Program
DWPF	Defense Waste Processing Facility
Gy	Gray
Mgal	Million Gallons
mRem	Millirem
N/A	Not Applicable
ORR	Operational Readiness Review
rad	Radiation Absorbed Dose
rem	Roentgen Equivalent Man
RLW	Radioactive Liquid Waste
RPP	Radiation Protection Program
SI	International System of units
SRS	Savannah River Site
Sv	Sievert
SWPF	Salt Waste Processing Facility
The Rule	10 CFR 835

## **1.0 RADIATION PROTECTION PROGRAM SUMMARY**

The Salt Waste Processing Facility (SWPF) Project S-RCP-J-00001, *SWPF Standards/Requirements Identification Document*<sup>1</sup> identifies 10 Code of Federal Regulations (CFR) 835, *Occupational Radiation Protection*<sup>2</sup> as the driver for the Radiation Protection Program (RPP). This RPP has been designed to ensure that radiation protection requirements, as defined in 10 CFR 835<sup>2</sup>, have been incorporated into the facility design and conduct of radiological work at the SWPF Project.

This RPP establishes radiation protection standards, limits, and program requirements for protecting individuals from occupational exposures to ionizing radiation resulting from work performed for the U.S. Department of Energy (DOE) Office of Environmental Management related to the SWPF Project through Contract DE-AC09-02SR22210, *Design, Construction, and Commissioning of a Salt Waste Processing Facility (SWPF)*<sup>3</sup>.

The purpose of this RPP is to formally commit in policy and deed to implementation of the requirements of 10 CFR 835<sup>2</sup>, as noted in this RPP.

Revision 5 of this RPP is submitted to address requirements of 10 CFR 835<sup>2</sup>, as amended through January 30, 2015. The document is formatted to align with the guidance provided in DOE G 441.1-1C, Admin Chg 1, *Radiation Protection Programs Guide for use with Title 10, Code of Federal Regulations, Part 835, Occupational Radiation Protection*<sup>4</sup>.

Submittal of this RPP does not request exemptions from any requirements contained within 10 CFR 835<sup>2</sup>, with applicability to the Hot Commissioning and Operations phases of the project. With approval of this RPP, there are no immediate additions of new programs or activities, nor does it impact other SWPF programs or activities.

With approval of this RPP by DOE, the SWPF Operating Contractor is claiming and committing to Full Compliance with each specific requirement contained in 10 CFR 835<sup>2</sup> prior to the start of Hot Commissioning and Operations, as detailed in Appendix A.

Funding required to develop and implement a fully compliant RPP has been factored into the existing Parsons Contract (DE-AC09-02SR22210<sup>3</sup>). Initial development and subsequent revisions to this RPP, along with development and implementation of commitments contained herein, were included in the initial baseline estimates.

## **2.0 GENERAL INFORMATION**

This RPP (Revision 5) is submitted to address specific requirements of 10 CFR 835<sup>2</sup>, as amended through January 30, 2015. Each requirement contained in 10 CFR 835<sup>2</sup> (The Rule) has been addressed in Appendix A of this RPP. The SWPF Operating Contractor classifies its compliance status as being in one of the following three categories.

1. Full Compliance: Indicates that the requirement is documented as a commitment in policy and that plans, protocols, and procedures are in place and functioning as each activity
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governed by “The Rule” commences. These required implementing documents and work practices are verifiable through inspection.

2. Not Applicable (N/A): Indicates that the SWPF Operating Contractor is not engaged in a particular activity governed by “The Rule”. For items that are determined to be N/A, the reason for this determination will be provided under the “COMMITMENT STATEMENT” section for that requirement, which is provided in Appendix A.
3. Partial Compliance: Indicates that the SWPF Operating Contractor is in Partial Compliance with a requirement, as it applies to current SWPF activities. Scheduling of Full Compliance as it applies to the SWPF is described in Section 7.0 and Appendix A.

The content of this plan is based upon the elements specified in DOE G 441.1-1C, Admin Chg 1<sup>4</sup>.

### **3.0 REGULATORY REQUIREMENTS AND APPLICABILITY**

Historically, nuclear material production operations conducted at the Savannah River Site (SRS) in Aiken, South Carolina, resulted in the generation of radioactive liquid waste (RLW) that was sent to the F- and H-Area Tank Farms for storage. Approximately 37 million gallons (Mgal) of RLW is currently being stored on an interim basis in existing underground waste storage tanks in the F- and H-Area Tank Farms. The RLW in these tanks includes approximately 3 Mgal of sludge containing precipitated solids and insoluble waste and 34 Mgal of salt solution and crystallized salts.

Parsons was awarded the Engineering, Procurement, and Construction Contract (DE-AC09-02SR22210<sup>3</sup>) by DOE to Design, Construct, Commission, and Operate the SWPF for one year at SRS.

10 CFR 835.101(d)<sup>2</sup> states: “The RPP shall specify the existing and/or anticipated 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”.

With submittal of this revision (Revision 5) of the RPP, the anticipated activities specifically related to Hot Commissioning and Operations includes receiving and processing RLW and transferring out the products of that processing to SRS Liquid Waste facilities, which requires Full Compliance with all applicable parts of 10 CFR 835<sup>2</sup>, as detailed in Appendix A.”

The SWPF is intended to concentrate the highly radioactive waste constituents, principally alpha-emitting actinides, long-lived strontium, and cesium radionuclides from salt waste solutions to be removed from the SRS RLW tanks. The main purpose is to reduce the volume of highly radioactive waste for permanent disposal. The concentrated waste containing most of the radioactivity will be sent to the Defense Waste Processing Facility (DWPF) for immobilization in a glass formulation. The decontaminated salt solution left after removal of the highly radioactive constituents will be sent to the Saltstone Production Facility for disposal in a cementitious grout.

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This RPP is applicable to SWPF employees and/or all subcontractors, in accordance with the provisions of the SWPF standard subcontract clauses, as well as DOE personnel (and employees of other Federal agencies performing activities at the SWPF) that have the potential to result in the following:

- Occupational exposures (as defined by 10 CFR 835<sup>2</sup>), to ionizing radiation,
- Exposure to minors and members of the public (as defined in 10 CFR 835.2<sup>2</sup>),
- Emergency exposures (as defined in 10 CFR 835.1302<sup>2</sup>), and
- Exposures to embryo/fetus of a declared pregnant worker (as defined in 10 CFR 835.2<sup>2</sup>).

Consequently, all personnel shall comply with the applicable radiation protection procedures that implement this RPP. Implementing guidance and requirements contained in this RPP are intended to help itemize and clarify radiation protection responsibilities and performance expectations.

### **3.1 Recognized Exclusions**

Applicability of exclusions include those listed in 10 CFR 835.1(b)<sup>2</sup> and, specifically, 10 CFR 835.1(b)(1)<sup>2</sup>.

During the Design, Construction, Testing and Cold Commissioning phases of the SWPF Project, non-destructive examination activities are performed by a Nuclear Regulatory Commission or State of South Carolina licensed vendor, and all examination activities will be conducted under the requirements of the subcontractor license and implementing procedures. Therefore, those activities are considered outside the scope of this RPP.

The SWPF Operating Contractor will utilize the 835.1(b)(1) Exclusion for contracted services up until the time the DOE approved RPP becomes enforceable at the start of Hot Commissioning, at which time compliance with the SWPF RPP will be met in conjunction with the NRC/Agreement State licensee program requirements for contracted services, if used.

### **3.2 As Low As Reasonably Achievable Policy**

With submittal of this RPP, the SWPF Operating Contractor establishes its policy toward the applicable requirements of 10 CFR 835<sup>2</sup> and for the conduct of its radiological operations in a manner that ensures a safe work environment for employees, DOE employees, subcontractors, visitors, and the general public.

The SWPF Operating Contractor is committed to conduct radiological operations in a manner that promotes the health and safety of all employees, subcontractors, and the general public. In achieving this objective, SWPF policy is to make every reasonable effort to maintain occupational, environmental, and public radiation exposure As Low As Reasonably Achievable (ALARA). The ALARA philosophy is predicated on the theory that any radiation exposure,

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however small, carries with it some risk that should be balanced by an off-setting benefit. SWPF Operating Contractor Management affirms the following:

1. Personal radiation exposure shall be maintained ALARA;
2. Radiation exposure of the work force and public shall be controlled by using a graded approach, such that radiation exposures are well below regulatory limits and there is no radiation exposure without commensurate benefit;
3. Each person involved in radiological work is expected to demonstrate responsibility and accountability through an informed, disciplined, and cautious attitude toward radiation and radioactivity;
4. Superior performance is evident when SWPF missions are completed and radiation exposures are maintained well below regulatory limits, contamination is minimized, radioactivity is well-controlled, and radiological spills or uncontrolled releases are prevented;
5. Continuing improvement is essential to excellence in radiological control; and
6. It is the responsibility of SWPF Operating Contractor Management and of all workers to comply with this RPP and use ALARA principles during all work activities.

#### **4.0 LIST OF APPLICABLE STANDARDS**

In this RPP, no standards or additional requirements are adopted or invoked by the SWPF Operating Contractor, beyond 10 CFR 835<sup>2</sup>.

#### **5.0 RESOURCE ASSESSMENT**

Funding required to develop and implement a fully compliant RPP has been factored into the existing Parsons Contract (DE-AC09-02SR22210<sup>3</sup>) baseline estimates. Appropriate levels of funding have been assigned for management of this RPP, development of programmatic documents, and acquisition of equipment, instrumentation, training and personnel to fully meet all commitments.

#### **6.0 PRIORITIZATION**

The SWPF Operating Contractor recognizes all applicable elements of 10 CFR 835<sup>2</sup> as being equal in importance. At the time of this RPP (Revision 5) submittal, the SWPF Operating Contractor has completed the Construction phase of the project and is transitioning into the Testing and Commissioning phases. As the SWPF transitions through the Testing and Cold Commissioning phases, project management will evaluate operational conditions for consideration of improvements of documented radiation protection programmatic documents, policies, procedures, plans or practices to ensure effective implementation of all 10 CFR 835<sup>2</sup> requirements during SWPF Hot Commissioning and Operations phases.

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## **7.0 ACTIVITIES, MILESTONES, AND SCHEDULES**

### **7.1 Compliance Scheduling**

This RPP submittal (Revision 5) formally commits in policy and deed to implementation of the requirements of 10 CFR 835<sup>2</sup> identifying specific requirements for which Full, Partial or N/A Compliance is claimed for the Hot Commissioning and Operations phase of the SWPF project.

Parsons is executing a phased (incremental) approach toward full programmatic and procedural development for article-specific compliance relative to Hot Commissioning and Operations. For scheduling purposes, Parsons plans to have all applicable and/or appropriate technical basis documents and implementing procedures developed and issued for use under mock-up or simulated conditions no later than 30 days prior to the start of SWPF Management Self Assessment which precedes the DOE Operational Readiness Review (ORR). Whereupon, at the end of the DOE ORR and prior to entering Hot Commissioning and Operations, the SWPF Operating Contractor will have achieved, and be able to demonstrate, Full Compliance with all 10 CFR 835<sup>2</sup> requirements.

Appendix A of this RPP provides a listing of each specific requirement contained in 10 CFR 835<sup>2</sup>, the current and/or scheduled compliance status, a commitment statement relevant to each requirement, and a description of the method used for compliance, as applicable.

### **7.2 Audits**

Internal audits of the RPP, including examination of program content and implementation, shall be conducted through a process that ensures all functional elements of the program are reviewed no less frequently than every 36 months. As a matter of practice, functional areas for which Full or Partial Compliance is claimed will be selected, scheduled, and reviewed.

The RPP audit schedule will be based on the functional elements outlined in DOE G 441.1-1C, Admin Chg 1<sup>4</sup>. For convenience, these elements are presented below in Table 7-1.

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**Table 7-1. 10 CFR 835<sup>2</sup> Functional Elements**

<b>Functional Element</b>	<b>10 CFR 835<sup>2</sup> Regulatory Provision</b>
1. Organization and Administration	Subpart B
2. As Low As Reasonably Achievable Program	101(c), Subpart K
3. External Dosimetry Program	401(a), 402(a),(b)
4. Internal Dosimetry Program	401(a), 402(c),(d)
5. Area Monitoring and Control	
a. Area Radiation Monitoring	401(a)
b. Airborne Radioactivity Monitoring	209, 401(a), 403
c. Contamination Monitoring and Control	401(a), Subpart L
d. Instrumentation Calibration and Maintenance	401(b)
6. Radiological Controls	
a. Radiological Work Planning	501(d), 1001(b), 1003
b. Entry and Exit Controls	Subpart F
c. Radiological Work controls	Subpart F, 1003
d. Posting and Labeling	Subpart G
e. Release of Materials and Equipment	1101
f. Sealed Radioactive Source Accountability and Control	Subpart M
7. Emergency Exposure Situations	1301, 1302
8. Nuclear Accident Dosimetry	1304
9. Records	Subpart H
10. Reports to Individuals	Subpart I
11. Radiation Safety Training	Subpart J
12. Limits for Embryo/Fetus	Subpart C

**8.0 EXEMPTIONS**

Submittal of this RPP does not request exemptions from any requirements contained within 10 CFR 835<sup>2</sup>.

**Appendix A. Radiation Protection Program Compliance Statements**

NOTE 1: The content of this appendix identifies each requirement, the Scheduled Implementation Date for Full Compliance, and the corresponding Commitment Statement.

NOTE 2: PL-RP-4500, *SWPF Radiation Protection Program Plan for 10 CFR 835 Occupational Radiation Protection Program*<sup>5</sup> is the overarching document containing the technical basis, interpretations, means and methods of program management and implementation for each 10 CFR 835 requirement. PL-RP-4500<sup>5</sup> and all implementing procedures will have been developed and issued for use under mock-up or simulated conditions no later than 30 days prior to the start of SWPF Management Self Assessment which precedes the DOE ORR.

<b>10 CFR 835: Revised through January 30, 2015</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**COMMITMENT STATEMENT:**

The SWPF Operating Contractor commits to comply with all parts 10 CFR 835 as they apply to the DOE activities performed “within the scope and applicability” of this Radiation Protection Program, as provided in the **January 30, 2015**, version of 10 CFR 835.

With submission of Revision 5 of this RPP there are no known or expected work evolutions that involve personnel exposure to, or handling of, radioactive materials during the Design, Construction, Testing and Cold Commissioning phases of the Project.

At the time of initiation of Hot Commissioning and Operations, the SWPF Operating Contractor commits to have achieved Full Compliance with all parts of 10 CFR 835 as scheduled in this RPP and Appendix A.

<b>10 CFR 835: Appendix A</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*Appendix A provides derived air concentration (DAC) values for various radionuclides.*

**COMMITMENT STATEMENT:**

The SWPF Operating Contractor adopts and complies with Appendix A, its preamble, and Footnotes 1 – 5 in its entirety.

<b>10 CFR 835: Appendix B [Reserved]</b>	CURRENT STATUS: N/A
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**REQUIREMENT STATEMENT:**

*The Section has been reserved by DOE.*

**COMMITMENT STATEMENT:**

The Section does not require a Commitment Statement or implementation scheduling.

<b>10 CFR 835: Appendix C</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT (Preamble, Appendix A, Second Paragraph):**

Appendix C to Part 835 — DERIVED AIR CONCENTRATION (DAC) FOR WORKERS FROM EXTERNAL EXPOSURE DURING IMMERSION IN A CLOUD OF AIRBORNE RADIOACTIVE MATERIAL

**COMMITMENT STATEMENT:**

The SWPF Operating Contractor adopts and complies with Appendix C and its preamble in its entirety.

<b>10 CFR 835: Appendix D</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

**Appendix D to Part 835--SURFACE CONTAMINATION VALUES**

*The data presented in appendix D are to be used in 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.*

**COMMITMENT STATEMENT:**

The SWPF Operating Contractor uses and adopts Appendix D in its entirety to identify and post contamination and high contamination areas in accordance with § 835.603(e) and (f) and for identifying the need for surface contamination monitoring and control in accordance with § 835.1101 and 1102.

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<b>10 CFR 835: Appendix E</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

**Appendix E to Part 835--VALUES 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.*

**COMMITMENT STATEMENT:**

The SWPF Operating Contractor uses Appendix E, in its entirety 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.

<b>10 CFR 835: 1(a)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*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.*

**COMMITMENT STATEMENT:**

The SWPF Operating Contractor recognizes that 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.

<b>10 CFR 835: 1(b)(1) – (7)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*(b) Exclusion. Except as provided in paragraph (c) of this section, the requirements in this part do not apply to:*

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- (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;*
- (2) Activities conducted under the authority of the Deputy Administrator for Naval Reactors, as described in Pub. L. 98-525 and 106-65;*
- (3) Activities conducted under the Nuclear Explosives and Weapons Surety Program relating to the prevention of accidental or 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 participation as a subject in medical research programs; or*
- (6) Radioactive material on or within material, equipment, and real property which 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 which has been approved by a Secretarial Officer in consultation with the Associate Under Secretary for Environment, Health, Safety and Security.*
- (7) Radioactive material transportation not performed by DOE or a DOE contractor.*

**COMMITMENT STATEMENT:**

The SWPF Operating Contractor recognizes that the requirements in this do not apply to:

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;
  2. Activities conducted under the authority of the Deputy Administrator for Naval Reactors, as described in Pub. L. 98-525 and 106-65;
  3. Activities conducted under the Nuclear Explosives and Weapons Surety Program relating to the prevention of accidental or 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 participation as a subject in medical research programs; or
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6. Radioactive material on or within material, equipment, and real property which 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 which has been approved by a Secretarial Officer in consultation with the Associate Under Secretary for Environment, Health, Safety and Security, and
7. Radioactive material transportation not performed by DOE or a DOE contractor.

<b>10 CFR 835: 1(c)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*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 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.*

**COMMITMENT STATEMENT:**

The SWPF Operating Contractor recognizes that occupational doses received as a result of excluded activities and radioactive material transportation, as listed in paragraphs (b)(1) through (b)(4) and (b)(7) of this section, shall be considered when determining compliance with the 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.

<b>10 CFR 835: 1(d)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*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 (2) In accordance with U.S. Department of Transportation regulations or DOE Orders that govern such movements.*

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**COMMITMENT STATEMENT:**

The SWPF Operating Contractor understands that 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 (2) In accordance with U.S. Department of Transportation regulations or DOE Orders that govern such movements.

<b>10 CFR 835: 2</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*(a) As used in this part: (defined terms not copied here); (b) As used in this part to describe various aspects of radiation dose: (defined terms not copied here); (c) Terms defined in the Atomic Energy Act of 1954 or in 10 CFR 820 and not defined in this part are used consistent with their meanings given in the Atomic Energy Act of 1954 or in 10 CFR 820.*

**COMMITMENT STATEMENT:**

The SWPF Operating Contractor accepts the definitions of general terminology in section 10 CFR 835.2(a) and the definitions of dosimetry terminology in section 10 CFR 835.2(b). The SWPF Operating Contractor recognizes that terms defined in the Atomic Energy Act and not defined in this part are used consistent with the meanings given in the Act.

A full listing of definitions used by the SWPF RPP are included in Appendix A of PL-RP-4500<sup>5</sup>.

<b>10 CFR 835: 3(a)(1)-(2)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*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.*

**COMMITMENT STATEMENT:**

No person or DOE personnel shall take any action, or cause actions to be taken, that are inconsistent with the requirements of this RPP, or any plan, schedule or other process established to ensure compliance with this RPP.

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<b>10 CFR 835: 3(b)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*With respect to a particular DOE activity, contractor management shall be responsible for compliance with the requirements of this part.*

**COMMITMENT STATEMENT:**

With respect to all DOE activities conducted under Contract DE-AC09-02SR22210<sup>3</sup>, the highest levels of line management for the SWPF Operating Contractor will maintain the authority and responsibility to ensure compliance with the requirements of 10 CFR 835.

<b>10 CFR 835: 3(c)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*Where there is no contractor for a DOE activity, DOE shall ensure implementation of and compliance with the requirements of this part.*

**COMMITMENT STATEMENT:**

This requirement is not applicable to the SWPF Operating Contractor; it is directly applicable to DOE.

<b>10 CFR 835: 3(d)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*Nothing in this part shall be construed as limiting actions that may be necessary to protect health and safety.*

**COMMITMENT STATEMENT:**

The SWPF Operating Contractor does not construe the requirements in 10 CFR 835 as limiting any actions that are necessary to protect health and safety.

<b>10 CFR 835: 3(e)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*For those activities that are required by 10 CFR 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.*

**COMMITMENT STATEMENT:**

The SWPF Operating Contractor may extend the time interval to conduct the activities required by 10 CFR 835.102, 835.901(e), 835.1202(a), and 835.1202(b) by a period not to exceed 30 days.

<b>10 CFR 835: 4</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*Unless otherwise specified, the quantities used in the records required by this part shall be clearly indicated in special units of curie, radiation absorbed dose (rad), roentgen, or roentgen equivalent man (rem), including multiples and subdivisions of these units, or other conventional units, such as, dpm, dpm/100 cm<sup>2</sup> or mass units. The International System (SI) units, becquerel (Bq), gray (Gy), and sievert (Sv) may be provided parenthetically for reference with scientific standards.*

**COMMITMENT STATEMENT:**

The SWPF Operating Contractor records required by 10 CFR 835 will be maintained in the special units of curie, rad, roentgen, rem, or dpm including multiples and subdivisions of these units, or other conventional units, such as, dpm, dpm/100 cm<sup>2</sup> or mass units. The SI units Bq, Gy, and Sv may be provided parenthetically for reference with scientific standards.

<b>10 CFR 835: 101(a)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*A DOE activity shall be conducted in compliance with a documented RPP as approved by the DOE.*

**COMMITMENT STATEMENT:**

All SWPF activities performed under contract to DOE will be conducted in compliance with this RPP, when approved by DOE. Future RPP revisions and subsequent DOE approvals will fall under the normal provisions of "The Rule".

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<b>10 CFR 835: 101(b)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*DOE may direct or make modifications to an RPP.*

**COMMITMENT STATEMENT:**

The SWPF Operating Contractor acknowledges DOE's authority to direct or make modification to an RPP.

<b>10 CFR 835: 101(c)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*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 ALARA process to occupational exposure.*

**COMMITMENT STATEMENT:**

The SWPF RPP shall be commensurate with the nature of the activities performed under the Contract (DE-AC09-02SR22210<sup>3</sup>), and includes formal plans and measures for applying the ALARA process to occupational exposure.

<b>10 CFR 835: 101(d).01</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*The RPP shall specify the existing and/or anticipated operational tasks that are intended to be within the scope of the RPP.*

**COMMITMENT STATEMENT:**

The SWPF RPP specifies the existing and/or anticipated operational tasks that are intended to be within the scope of the RPP.

<b>10 CFR 835: 101(d).02</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*Except as provided in 10 CFR 835.101(h), any task outside the scope of an RPP shall not be initiated until an update of the RPP is approved by DOE.*

**COMMITMENT STATEMENT:**

The SWPF Operating Contractor will perform no tasks outside the scope of the RPP until an update of the RPP is approved by DOE, except under conditions defined in 10 CFR 835.101(h).

<b>10 CFR 835: 101(e)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*The content of the RPP shall address, but shall not necessarily be limited to, each requirement in this part.*

**COMMITMENT STATEMENT:**

The SWPF RPP addresses all applicable requirements in 10 CFR 835.

<b>10 CFR 835: 101(f)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*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.*

**COMMITMENT STATEMENT:**

The SWPF Operating Contractor has committed to plans, schedules, and other measures contained in this Plan for achieving compliance with the June 8, 2007 amendment, as applicable.

<b>10 CFR 835: 101(g)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*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.*

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**COMMITMENT STATEMENT:**

The SWPF Operating Contractor will submit an update of the RPP 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.

<b>10 CFR 835: 101(h).01</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*Changes, additions, or updates to the RPP may become effective without prior Department approval only if the changes do not decrease the effectiveness of the RPP and the RPP, as changed, continues to meet the requirements of this part.*

**COMMITMENT STATEMENT:**

The SWPF Operating Contractor will implement changes, additions, or updates to the RPP without prior Department approval only if the changes do not decrease the effectiveness of the RPP and the RPP, as changed, continues to meet the requirements of this part.

<b>10 CFR 835: 101(h).02</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*Proposed changes that decrease the effectiveness of the RPP shall not be implemented without submittal to and approval by the Department.*

**COMMITMENT STATEMENT:**

The SWPF Operating Contractor will not implement proposed changes to the RPP that decrease the effectiveness of the RPP without submittal to and approval by the DOE.

<b>10 CFR 835: 101(i)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*An initial RPP or an update shall be considered approved 180 days after its submission unless rejected by DOE at an earlier date.*

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**COMMITMENT STATEMENT:**

The SWPF Operating Contractor considers the RPP as approved 180 days following submission to DOE unless rejected by DOE at an earlier date.

<b>10 CFR 835: 102</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*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.*

**COMMITMENT STATEMENT:**

The SWPF Operating Contractor conducts internal audits, reviewing program content and implementation, of all functional elements of the radiation protection program every 36 months or less.

<b>10 CFR 835: 103</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*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.*

**COMMITMENT STATEMENT:**

The SWPF Operating Contractor will ensure individuals responsible for developing and implementing measures necessary for ensuring compliance have the appropriate education, training, and skills to discharge these responsibilities.

<b>10 CFR 835: 104</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*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 the individuals exposed to those hazards.*

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**COMMITMENT STATEMENT:**

The SWPF Operating Contractor has developed and implemented written procedures that are commensurate with the radiological hazards created by the activity and consistent with the education, training, and skills of the individuals exposed to the hazards.

<b>10 CFR 835: 202(a)(1) – (4)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*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 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);*
- (3) An equivalent dose to the lens of the eye of 15 rems (0.15 Sv); and*
- (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).*

**COMMITMENT STATEMENT:**

Except for planned special exposures conducted consistent with 10 CFR 835.204 and emergency exposures authorized in accordance with 10 CFR 835.1302, the SWPF Operating Contractor controls the occupational dose received by general employees such that: (1) A total effective dose of 5 rems (0.05 Sv); (2) 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); (3) An equivalent dose to the lens of the eye of 15 rems (0.15 Sv); and (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).

<b>10 CFR 835: 202(b)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*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.*

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**COMMITMENT STATEMENT:**

Except doses resulting from planned special exposures conducted in compliance with 10 CFR 835.204 and emergency exposures authorized in accordance with 10 CFR 835.1302, the SWPF Operating Contractor will include all occupational doses received during the current year when demonstrating compliance with 10 CFR 835.202(a) and 835.207.

<b>10 CFR 835: 202(c)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*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.*

**COMMITMENT STATEMENT:**

The SWPF Operating Contractor does not include doses from background, therapeutic and diagnostic medical radiation, and participation as a subject in medical research programs in dose records or in the assessment of compliance with the occupational exposure limits.

<b>10 CFR 835: 203(a)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*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.*

**COMMITMENT STATEMENT:**

The SWPF Operating Contractor will ensure that determining the total effective dose during the year, by summing the effective dose from external sources and the committed effective dose from intakes during the year, will be in accordance with the SRS DOE Laboratory Accreditation Program (DOELAP) accredited Health Physics Services program.

<b>10 CFR 835: 203(b)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*Determinations of the effective dose shall be made using the radiation and tissue weighting factor values provided in § 835.2.*

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**COMMITMENT STATEMENT:**

The SWPF Operating Contractor will ensure that determination of the effective dose, by using the radiation and tissue weighting factors as provided in 10 CFR 835.2, will be in accordance with the SRS DOELAP accredited Health Physics Services program.

<b>10 CFR 835: 204(a)(1) – (3)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*A planned special exposure may be authorized for a radiological worker to receive doses in addition to and accounted for 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 environment, safety and health matters.*

**COMMITMENT STATEMENT:**

A planned special exposure may be authorized for a radiological worker to receive doses in addition to and accounted for separately from the doses received under the limits specified in 10 CFR 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 environment, safety and health matters.

<b>10 CFR 835: 204(b)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*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.*

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**COMMITMENT STATEMENT:**

Prior to requesting an individual to participate in an authorized planned special exposure, the SWPF Operating Contractor will determine the individual's dose from all previous planned special exposures and all doses in excess of the occupational dose limits.

<b>10 CFR 835: 204(c)(1) – (2)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*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 § 835.202(a); and*
- (2) Over the individual's lifetime, five times the numerical values of the dose limits established at § 835.202(a).*

**COMMITMENT STATEMENT:**

The SWPF Operating Contractor will not authorize an individual to receive a planned special exposure that, in addition to the doses determined in 10 CFR 835.204(b), would result in a dose exceeding; (1) the dose limits established in 10 CFR 835.202(a) in a year, and (2) Over the individual's lifetime, five times the numerical values of the dose limits established at § 835.202(a).

<b>10 CFR 835: 204(d)(1) – (3)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*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 present.*

**COMMITMENT STATEMENT:**

The SWPF Operating Contractor will obtain written consent from each individual involved in a planned special exposure and each written consent will include: (1) The purpose of the planned

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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 present.

<b>10 CFR 835: 204(e)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*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).*

**COMMITMENT STATEMENT:**

The SWPF Operating Contractor will maintain records of the conduct of a planned special exposure and will submit a written report within 30 days after the planned special exposure to the approving organizations identified in 10 CFR 835.204(a)(3).

<b>10 CFR 835: 204(f)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*The dose from planned special exposures is not to be considered in controlling future occupational dose of the individual under 10 CFR 835.202(a), but is to be included in records and reports required under this part.*

**COMMITMENT STATEMENT:**

The SWPF Operating Contractor will not use the dose from planned special exposures when controlling future occupational dose of the exposed individual under 10 CFR 835.202(a), but the planned special exposure dose will be included in records and reports required under 10 CFR 835.

<b>10 CFR 835: 205(a)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*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.*

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**COMMITMENT STATEMENT:**

The SWPF Operating Contractor assesses non-uniform exposures of the skin from X-rays, beta radiation, and/or radioactive material on the skin as specified in 10 CFR 835.205.

<b>10 CFR 835: 205(b)(1) – (3)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*For purposes of demonstrating compliance with 10 CFR 835.202 (a)(4), assessments shall be conducted as follows:*

- (1) Area of skin irradiated is 100 cm<sup>2</sup> or more. The non-uniform equivalent dose received during the year shall be averaged over the 100 cm<sup>2</sup> 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.*
- (2) Area of skin irradiated is 10 cm<sup>2</sup> or more, but is less than 100 cm<sup>2</sup>. 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 the equivalent dose averaged over the 1 cm<sup>2</sup> of skin receiving the maximum absorbed dose, D, reduced by the fraction f, which is the irradiated area in cm<sup>2</sup> divided by 100 cm<sup>2</sup> (i.e.,  $H = fD$ ). In no case shall a value of f less than 0.1 be used.*
- (3) Area of skin irradiated is less than 10 cm<sup>2</sup>. The non-uniform equivalent dose shall be averaged over the 1 cm<sup>2</sup> of skin receiving the maximum dose. This equivalent dose shall:
  - (i) Be recorded in the individual's occupational exposure history as a special entry; and*
  - (ii) Not be added to any other equivalent dose to any extremity or skin for the year.**

**COMMITMENT STATEMENT:**

For purposes of demonstrating compliance with 10 CFR 835.202 (a)(4), the SWPF Operating Contractor assessments are conducted as follows:

- (1) Area of skin irradiated is 100 cm<sup>2</sup> or more. The non-uniform equivalent dose received during the year shall be averaged over the 100 cm<sup>2</sup> 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.*
  - (2) Area of skin irradiated is 10 cm<sup>2</sup> or more, but is less than 100 cm<sup>2</sup>. 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 the equivalent dose averaged over the 1 cm<sup>2</sup> of skin receiving the maximum absorbed dose, D, reduced by the fraction f, which is the irradiated area in cm<sup>2</sup> divided by 100 cm<sup>2</sup> (i.e.,  $H = fD$ ). In no case shall a value of f less than 0.1 be used.*
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- (3) Area of skin irradiated is less than 10 cm<sup>2</sup>. The non-uniform equivalent dose shall be averaged over the 1 cm<sup>2</sup> of skin receiving the maximum dose. This equivalent dose shall:
- (i) Be recorded in the individual's occupational exposure history as a special entry; and
  - ii) Not be added to any other equivalent dose to any extremity or skin for the year.

<b>10 CFR 835: 206(a)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*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).*

**COMMITMENT STATEMENT:**

The SWPF Operating Contractor 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).

<b>10 CFR 835: 206(b)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*Substantial variation above a uniform exposure rate that would satisfy the limits provided in 10 CFR 835.206(a) shall be avoided.*

**COMMITMENT STATEMENT:**

The SWPF Operating Contractor will avoid substantial variations above a uniform exposure rate that would satisfy the limits in 10 CFR 835.206(a).

<b>10 CFR 835: 206(c)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*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.*

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**COMMITMENT STATEMENT:**

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.

<b>10 CFR 835: 207</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*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).*

**COMMITMENT STATEMENT:**

The SWPF Operating Contractor will not occupationally expose any minor to radiation and/or radioactive material at a SWPF operated site or facility such that the minor exceeds 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).

<b>10 CFR 835: 208</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*The total effective dose limit for members 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.*

**COMMITMENT STATEMENT:**

The SWPF Operating Contractor will not expose any member of the public to radiation and/or radioactive material during access to a controlled area at a SWPF operated site or facility such that the total effective dose equivalent exceeds 0.1 rem (0.001 Sv) in a year.

<b>10 CFR 835: 209(a)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*The DAC values given in appendices A and C of this part shall be used in the control of occupational exposures to airborne radioactive material.*

**COMMITMENT STATEMENT:**

The DAC values given in Appendices A and C of 10 CFR 835 are used in the control of occupational exposures to airborne radioactive material.

<b>10 CFR 835: 209(b)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*The estimation of internal dose shall be based on bioassay data rather than air concentration values unless bioassay data are:*

- (1) Unavailable;*
- (2) Inadequate; or*
- (3) Internal dose estimates based on air concentration values are demonstrated to be as or more accurate.*

**COMMITMENT STATEMENT:**

The SWPF Operating Contractor will base its estimation of internal dose on bioassay data, rather than air concentrations values, unless bioassay data are unavailable or inadequate or internal dose estimates based on air concentration values are demonstrated to be as or more accurate, in accordance with the SRS DOELAP accredited Health Physics Services program.

<b>10 CFR 835: 401(a)(1)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*Monitoring of individuals and areas shall be performed to:  
Demonstrate compliance with the regulations in this part.*

**COMMITMENT STATEMENT:**

The SWPF Operating Contractor monitors individuals and areas to demonstrate compliance with the regulations in 10 CFR 835.

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<b>10 CFR 835: 401(a)(2)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*Monitoring of individuals and areas shall be performed to:  
Document radiological conditions.*

**COMMITMENT STATEMENT:**

The SWPF Operating Contractor monitors individuals and areas to document radiological conditions.

<b>10 CFR 835: 401(a)(3)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*Monitoring of individuals and areas shall be performed to:  
Detect changes in radiological conditions.*

**COMMITMENT STATEMENT:**

The SWPF Operating Contractor monitors individuals and areas to detect changes in radiological conditions.

<b>10 CFR 835: 401(a)(4)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*Monitoring of individuals and area shall be performed to:  
Detect the gradual buildup of radioactive material.*

**COMMITMENT STATEMENT:**

The SWPF Operating Contractor monitors individuals and areas to detect the gradual buildup of radioactive material.

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<b>10 CFR 835: 401(a)(5)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*Monitoring of individuals and areas shall be performed to:*

*Verify the effectiveness of engineered and administrative controls in containing radioactive material and reducing radiation exposure.*

**COMMITMENT STATEMENT:**

The SWPF Operating Contractor monitors individuals and areas to verify the effectiveness of engineered and administrative controls in containing radioactive material and reducing radiation exposure.

<b>10 CFR 835: 401(a)(6)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*Monitoring of individuals and areas shall be performed to:*

*Identify and control potential sources of individual exposure to radiation and/or radioactive material.*

**COMMITMENT STATEMENT:**

The SWPF Operating Contractor performs monitoring of individuals and areas, as necessary, to identify and control potential sources of individual exposure to radiation and/or radioactive material.

<b>10 CFR 835: 401(b)(1)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*Instruments and equipment used for monitoring shall be:*

*Periodically maintained and calibrated on an established frequency.*

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**COMMITMENT STATEMENT:**

The SWPF Operating Contractor will maintain and have instruments calibrated and/or repaired, on an established frequency, in accordance with the SRS Health Physics Instrumentation and Calibration Laboratory program or an equally qualified off-site service provider.

<b>10 CFR 835: 401(b)(2)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*Instruments and equipment used for monitoring shall be:*

*Appropriate for the type(s), levels, and energies of the radiation(s) encountered.*

**COMMITMENT STATEMENT:**

The SWPF Operating Contractor uses instruments and equipment for monitoring that are appropriate for the types, levels, and energies of the radiation encountered.

<b>10 CFR 835: 401(b)(3)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*Instruments and equipment used for monitoring shall be:*

*Appropriate for existing environmental conditions.*

**COMMITMENT STATEMENT:**

The SWPF Operating Contractor uses instruments and equipment for monitoring that are appropriate for existing environmental conditions.

<b>10 CFR 835: 401(b)(4)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*Instruments and equipment used for monitoring shall be:*

*Routinely tested for operability.*

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**COMMITMENT STATEMENT:**

The SWPF Operating Contractor uses instruments and equipment for monitoring that are routinely tested for operability.

<b>10 CFR 835: 402(a)(1) – (5)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*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 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 at § 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.*

**COMMITMENT STATEMENT:**

For the purposes of monitoring individual exposures to external radiation, personnel dosimeters supplied from the SRS DOELAP accredited Health Physics Services program, will be required and provided by the SWPF Operating Contractor to:

- (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 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 at § 835.207 in a year from external sources;*
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- (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.

<b>10 CFR 835: 402(b)(1)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*External dose monitoring programs implemented to demonstrate compliance with 10 CFR 835.402(a) shall be adequate to demonstrate compliance with the dose limits established in subpart C of this part and shall be:*

*Accredited, or excepted from accreditation, in accordance with the DOE Laboratory Accreditation Program for Personnel Dosimetry; or*

**COMMITMENT STATEMENT:**

The SWPF Operating Contractor will implement an external dose monitoring program that is adequate to demonstrate compliance with 10 CFR 835.402(a) and in accordance with the requirements of the SRS DOELAP accredited Health Physics Services program.

<b>10 CFR 835: 402(b)(2)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*External dose monitoring programs implemented to demonstrate compliance with 10 CFR 835.402(a) shall be adequate to demonstrate compliance with the dose limits established in subpart C of this part and shall be:*

*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.*

**COMMITMENT STATEMENT:**

The SWPF Operating Contractor will implement an external dose monitoring program in accordance with the requirements of the SRS DOELAP accredited Health Physics Services program.

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<b>10 CFR 835: 402(c)(1) – (4)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*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 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.*

**COMMITMENT STATEMENT:**

For the purposes of monitoring individual exposures to internal radiation, the internal dosimetry program will be implemented in accordance with the requirements of the SRS DOELAP accredited Health Physics Services program, 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 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.
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<b>10 CFR 835: 402(d)(1)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*Internal dose monitoring programs implemented to demonstrate compliance with 10 CFR 835.402(c) shall be adequate to demonstrate compliance with the dose limits established in subpart C of this part and shall be:*

*Accredited, or excepted from accreditation, in accordance with the DOE Laboratory Accreditation Program for Radiobioassay.*

**COMMITMENT STATEMENT:**

The SWPF Operating Contractor will implement an internal dose monitoring program that is adequate to demonstrate compliance with 10 CFR 835.402(c) and in accordance with the requirements of the SRS DOELAP accredited Health Physics Services program.

<b>10 CFR 835: 402 (d)(2)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*Internal dose monitoring programs implemented to demonstrate compliance with 10 CFR 835.402(c) shall be adequate to demonstrate compliance with the dose limits established in subpart C of this part and shall be:*

*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.*

**COMMITMENT STATEMENT:**

The SWPF Operating Contractor will implement an internal dose monitoring program in accordance with the requirements of the SRS DOELAP accredited Health Physics Services program.

<b>10 CFR 835: 403(a)(1)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*Monitoring of airborne radioactivity shall be performed:*

*Where an individual is likely to receive an exposure of 40 or more DAC-hours in a year.*

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**COMMITMENT STATEMENT:**

The SWPF Operating Contractor will perform monitoring of airborne radioactivity concentrations where an individual is likely to receive an exposure of  $\geq 40$  DAC-hours in a year.

<b>10 CFR 835: 403(a)(2)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*Monitoring of airborne radioactivity shall be performed:*

*As necessary to characterize the airborne radioactivity hazard where respiratory protective devices for protection against airborne radionuclides have been prescribed.*

**COMMITMENT STATEMENT:**

The SWPF Operating Contractor performs monitoring of airborne radioactivity as necessary to characterize the airborne radioactivity hazard where respiratory protective devices for protection against airborne radionuclides have been prescribed.

<b>10 CFR 835: 403(b)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*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.*

**COMMITMENT STATEMENT:**

The SWPF Operating Contractor performs real-time air monitoring, as necessary, to detect and provide warning of airborne radioactivity concentrations that warrant immediate action to terminate inhalation of airborne radioactive material.

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<b>10 CFR 835: 405(a)(1) and (2)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*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 expeditiously after receiving such notification.*

**COMMITMENT STATEMENT:**

When 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, the SWPF Operating Contractor will 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 expeditiously after receiving such notification.

<b>10 CFR 835: 405 (b)(1),(2), and (3)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*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 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.*
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**COMMITMENT STATEMENT:**

The SWPF Operating Contractor will, upon receipt from radioactive material transportation, monitor the external surfaces of packages known to contain radioactive material 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 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.

<b>10 CFR 835: 405(c)(1),(2)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*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 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.*

**COMMITMENT STATEMENT:**

In reference to the monitoring required by 10 CFR 835.405(b), the SWPF Operating Contractor will include measurements of removable contamination levels, unless the package contains only special form (as defined at 10 CFR 71.4) or gaseous radioactive material and will include measurements of the radiation levels, if the package contains a Type B quantity (as defined at 10 CFR 71.4) of radioactive material.

<b>10 CFR 835: 405(d)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*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 beginning of the working day following receipt of the package.*

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**COMMITMENT STATEMENT:**

The SWPF Operating Contractor will complete the monitoring required by 10 CFR 835.405(b) as soon as practicable following receipt of the package, but not later than 8 hours after the beginning of the working day following receipt of the package.

<b>10 CFR 835: 405(e)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*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.*

**COMMITMENT STATEMENT:**

The SWPF Operating Contractor may choose not to perform monitoring pursuant to § 835.405(b) when packages transported on a DOE site 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.

<b>10 CFR 835: 501(a)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*Personnel entry control shall be maintained for each radiological area.*

**COMMITMENT STATEMENT:**

The SWPF Operating Contractor maintains control of personnel entering each radiological area.

<b>10 CFR 835: 501(b)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*The degree of [personnel entry] control shall be commensurate with existing and potential radiological hazards within the area.*

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**COMMITMENT STATEMENT:**

The SWPF Operating Contractor maintains the degree of personnel entry control (either administrative or engineered) so that it is commensurate with the existing and potential radiological hazards within the area.

<b>10 CFR 835: 501(c)(1) - (5)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*One or more of the following methods shall be used to ensure (personnel entry) 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.*

**COMMITMENT STATEMENT:**

The SWPF Operating Contractor entry control program consists of one or more of the following methods:

- (1) Signs and barricades
- (2) Control devices on entrances
- (3) Conspicuous visual and/or audible alarms
- (4) Locked entrance ways, or
- (5) Administrative controls.

<b>10 CFR 835: 501(d).01</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*Written authorizations shall be required to control entry into and perform work within radiological areas.*

**COMMITMENT STATEMENT:**

The SWPF Operating Contractor requires written authorizations to control entry into and perform work within radiological areas.

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<b>10 CFR 835: 501(d).02</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*These authorizations shall specify radiation protection measures commensurate with the existing and potential hazards.*

**COMMITMENT STATEMENT:**

The SWPF Operating Contractor written authorizations specify radiation protection measures commensurate with the existing and potential hazards.

<b>10 CFR 835: 501(e)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*No control(s) shall be installed at any radiological area exit that would prevent rapid evacuation of personnel under emergency conditions.*

**COMMITMENT STATEMENT:**

The SWPF Operating Contractor will not install any controls at any radiological area exit that would prevent rapid evacuation of personnel under emergency conditions.

<b>10 CFR 835: 502(a)(1)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*The following measures shall be implemented for each entry into a high radiation area:*

*The area shall be monitored as necessary during access to determine the exposure rates to which the individuals are exposed.*

**COMMITMENT STATEMENT:**

The SWPF Operating Contractor will, for each entry into a high radiation area, monitor the area as necessary during access to determine the exposure rates to which the individuals are exposed.

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<b>10 CFR 835: 502(a)(2)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*The following measures shall be implemented for each entry into a high radiation area:*

*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.*

**COMMITMENT STATEMENT:**

The SWPF Operating Contractor will, for each entry into a high radiation area, monitor each individual using 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.

<b>10 CFR 835: 502(b)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*Physical controls. One or more of the following features 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 upon entry causes the radiation level to be reduced below that level defining 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;*
  - (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;*
  - (4) Entryways that are locked. During periods when access to the area is required, positive control over each entry is maintained;*
  - (5) Continuous direct or electronic surveillance that is capable of preventing unauthorized entry;*
  - (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*
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*to permit evacuation of the area or activation of a secondary control device that will prevent use or operation of the source.*

**COMMITMENT STATEMENT:**

Physical controls. The SWPF Operating Contractor uses one or more of the following features at each entrance or access point to a high radiation area:

- (1) 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 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.
- (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.
- (4) During periods when access to the area is required, positive control over each entry is maintained (i.e., entryways that are locked).
- (5) Continuous direct or electronic surveillance that is capable of preventing unauthorized entry;
- (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 of a secondary control device that will prevent use or operation of the source.

<b>10 CFR 835: 502(c)</b>	Scheduled Implementation for Full Compliance: <b>HOT COMMISSIONING</b>
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**REQUIREMENT STATEMENT:**

*Very high radiation areas. In addition to the above requirements (10 CFR 835.502[b]), additional measures shall be implemented to ensure individuals are not able to gain unauthorized or inadvertent access to very high radiation areas.*

**COMMITMENT STATEMENT:**

In addition to the above requirements (10 CFR 835.502[b]), the SWPF Operating Contractor will implement additional measures to ensure individuals are not able to gain unauthorized or inadvertent access to very high radiation areas.

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<b>10 CFR 835: 502(d)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*No control(s) shall be established in a high or very high radiation area that would prevent rapid evacuation of personnel.*

**COMMITMENT STATEMENT:**

The SWPF Operating Contractor will implement no controls in a high or very high radiation area that would prevent rapid evacuation of personnel.

<b>10 CFR 835: 601(a)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*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.*

**COMMITMENT STATEMENT:**

The SWPF Operating Contractor uses signs and labels with a yellow background. The radiation symbol is either black or magenta.

<b>10 CFR 835: 601(b)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*Signs required by this subpart shall be clearly and conspicuously posted and may include radiological protection instructions.*

**COMMITMENT STATEMENT:**

The SWPF Operating Contractor posts signs that are clear and conspicuous and may include radiological protection instructions.

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<b>10 CFR 835: 601(c).01</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*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.*

**COMMITMENT STATEMENT:**

The SWPF Operating Contractor may modify the posting and labeling requirements to reflect the special considerations of DOE activities conducted at private residences or businesses.

<b>10 CFR 835: 601(c).02</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*Such modifications [to posting requirements] shall provide the same level of protection to individuals as the existing provisions in this subpart.*

**COMMITMENT STATEMENT:**

If the SWPF Operating Contractor makes modifications to posting requirements, the modifications will provide the same level of protection to individuals as the provisions in 10 CFR 835.601.

<b>10 CFR 835: 602(a)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*Each access point to a controlled area (as defined in 10 CFR 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 materials areas are not expected to receive a total effective dose of more than 0.1 rem (0.001 Sv) in a year.*

**COMMITMENT STATEMENT:**

The SWPF Operating Contractor posts each access point to a controlled area (as defined in 10 CFR 835.2), identifying it as a controlled area, whenever radiological areas or radioactive material areas exist in the area. Individuals who enter only controlled areas without entering

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radiological areas or radioactive materials areas are not expected to receive a total effective dose equivalent of more than 0.1rem (0.001 Sv) in a year.

<b>10 CFR 835: 602(b)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*Signs used for this purpose may be selected by the contractor to avoid conflict with local security requirements.*

**COMMITMENT STATEMENT:**

The SWPF Operating Contractor may select signs to avoid conflict with local security requirements.

<b>10 CFR 835: 603</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*Each access point to radiological areas and radioactive material areas (as defined in 10 CFR 835.2) shall be posted with conspicuous signs bearing the wording provided in this section.*

**COMMITMENT STATEMENT:**

The SWPF Operating Contractor posts conspicuous signs at each access point to radiological areas and radioactive material areas (as defined in 10 CFR 835.2), bearing the wording provided in 10 CFR 835.603.

<b>10 CFR 835: 603(a)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*Radiation Area. The words “Caution, Radiation Area” shall be posted at each radiation area.*

**COMMITMENT STATEMENT:**

Radiation Area. The words “Caution, Radiation Area” will be posted at each radiation area.

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<b>10 CFR 835: 603(b)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*High Radiation Area. The words “Caution, High Radiation Area” or “Danger, High Radiation Area” shall be posted at each high radiation area.*

**COMMITMENT STATEMENT:**

High Radiation Area. The words “Caution, High Radiation Area” or “Danger, High Radiation Area” will be posted at each high radiation area.

<b>10 CFR 835: 603(c)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*Very High Radiation Area. The words “Grave Danger, Very High Radiation Area” shall be posted at each very high radiation area.*

**COMMITMENT STATEMENT:**

Very High Radiation Area. The words “Grave Danger, Very High Radiation Area” will be posted at each very high radiation area.

<b>10 CFR 835: 603(d)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*Airborne Radioactivity Area. The words “Caution, Airborne Radioactivity Area” or “Danger, Airborne Radioactivity Area” shall be posted at each airborne radioactivity area.*

**COMMITMENT STATEMENT:**

Airborne Radioactivity Area. The words “Caution, Airborne Radioactivity Area” or “Danger, Airborne Radioactivity Area” will be posted at each airborne radioactivity area.

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<b>10 CFR 835: 603(e)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*Contamination Area. The words “Caution, Contamination Area” shall be posted at each contamination area.*

**COMMITMENT STATEMENT:**

Contamination Area. The words “Caution, Contamination Area” will be posted at each contamination area.

<b>10 CFR 835: 603(f)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*High Contamination Area. The words “Caution, High Contamination Area” or “Danger, High Contamination Area” shall be posted at each high contamination area.*

**COMMITMENT STATEMENT:**

High Contamination Area. The words “Caution, High Contamination Area” or “Danger, High Contamination Area” will be posted at each high contamination area.

<b>10 CFR 835: 603(g)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*Radioactive Material Area. The words “Caution, Radioactive Material(s) shall be posted at each radioactive material area.*

**COMMITMENT STATEMENT:**

Radioactive Material Area. The words “Caution, Radioactive Material(s) will be posted at each radioactive material area.

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<b>10 CFR 835: 604(a)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*Areas may be excepted from the posting requirements of 10 CFR 835.603 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.*

**COMMITMENT STATEMENT:**

The SWPF Operating Contractor may except areas from the posting requirements of 10 CFR 835.603 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.

<b>10 CFR 835: 604(b)(1) – (3)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*Areas may be excepted from the radioactive material area posting requirements of 10 CFR 835.603(g) when:*

- (1) Posted in accordance with 10 CFR 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 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).*

**COMMITMENT STATEMENT:**

The SWPF Operating Contractor may except areas from the radioactive material area posting requirements of 10 CFR 835.603(g) when:

- (1) Posted in accordance with 10 CFR 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 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).
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<b>10 CFR 835: 604(c)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*Areas containing only packages received from radioactive material transportation labeled and in non-degraded condition need not be posted in accordance with 10 CFR 835.603 until the packages are monitored in accordance with 10 CFR 835.405.*

**COMMITMENT STATEMENT:**

For areas containing only packages received from radioactive material transportation labeled and in non-degraded condition, the SWPF Operating Contractor need not post these areas in accordance with 10 CFR 835.603 until the packages are monitored in accordance with 10 CFR 835.405.

<b>10 CFR 835: 605.01</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*Except as provided in 10 CFR 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.”*

**COMMITMENT STATEMENT:**

Except as provided in 10 CFR 835.606, each item or container of radioactive material will bear a durable, clearly visible label bearing the standard radiation warning trefoil and the words “Caution, Radioactive Material” or “Danger, Radioactive Material.”

<b>10 CFR 835: 605.02</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*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.*

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**COMMITMENT STATEMENT:**

The label (described in 10 CFR 835.605(1)) will 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.

<b>10 CFR 835: 606(a)(1) – (6)</b>	Scheduled Implementation for Full Compliance: <b>HOT COMMISSIONING</b>
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**REQUIREMENT STATEMENT:**

*Items and containers may be excepted from the radioactive material labeling requirements of*

*10 CFR 835.605 when:*

- (1) Used, handled, or stored in areas posted and controlled in accordance with this subpart and sufficient 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.*
- (6) The radioactive material consists solely of nuclear weapons or their components.*

**COMMITMENT STATEMENT:**

The SWPF Operating Contractor may except items and containers from the radioactive material labeling requirements of 10 CFR 835.605 when:

- (1) Used, handled, or stored in areas posted and controlled in accordance with this subpart and sufficient 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
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- (5) Installed in manufacturing, process, or other equipment, such as reactor components, piping, and tanks.
- (6) The radioactive material consists solely of nuclear weapons or their components.

<b>10 CFR 835: 606(b)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*Radioactive material labels applied to sealed radioactive sources may be excepted from the color specifications of 10 CFR 835.601(a).*

**COMMITMENT STATEMENT:**

The SWPF Operating Contractor may except the radioactive material labels applied to sealed radioactive sources, from the color specifications of 10 CFR 835.601(a).

<b>10 CFR 835: 701(a)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*Records shall be maintained to document compliance with this part and with radiation protection programs required by 10 CFR 835.101.*

**COMMITMENT STATEMENT:**

The SWPF Operating Contractor maintains records to document compliance with 10 CFR 835.701(a) and with radiation protection programs required by 10 CFR 835.101.

<b>10 CFR 835: 701(b)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*Unless otherwise specified in this subpart, records shall be retained until final disposition is authorized by DOE.*

**COMMITMENT STATEMENT:**

The SWPF Operating Contractor maintains required records until final disposition is authorized by DOE.

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<b>10 CFR 835: 702(a)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*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.*

**COMMITMENT STATEMENT:**

The SWPF Operating Contractor will maintain records, except as authorized by § 835.702(b), 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.

<b>10 CFR 835: 702(b)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*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 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).*

**COMMITMENT STATEMENT:**

The SWPF Operating Contractor may choose to not record the non-uniform equivalent dose to the skin if the dose is less than 2 percent of the limit specified for the skin at § 835.202(a)(4).

The SWPF Operating Contractor may choose not to record internal dose (committed effective dose or committed equivalent dose) for any monitoring result estimated to correspond to an individual receiving less than 0.01 rem (0.1 mSv) committed effective dose. The SWPF Operating Contractor will maintain the bioassay or air monitoring result used to make the estimate 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).

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<b>10 CFR 835: 702(c)(1) – (6)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*(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 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;*
  - (ii) Committed equivalent dose to any organ or tissue of concern; and*
  - (iii) Identity of radionuclides.*
- (5) Include the following quantities for the summation of the external and internal dose:*
  - (i) Total effective dose in a year;*
  - (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*
  - (iii) Cumulative total effective dose.*
- (6) Include the equivalent dose to the embryo/fetus of a declared pregnant worker.*

**COMMITMENT STATEMENT:**

The SWPF Operating Contractor individual monitoring records are:

- (1) Sufficient to evaluate compliance with subpart C of 10 CFR 835;
- (2) Sufficient to provide dose information necessary to complete reports required by subpart I of 10 CFR 835;
- (3) Maintained to 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) Maintained to include the following information for internal dose resulting from intakes received during the year:
- (i) Committed effective dose;
  - (ii) Committed equivalent dose to any organ or tissue of concern; and
  - (iii) Identity of radionuclides.
- (5) Maintained to include the following quantities for the summation of the external and internal dose:
- (i) Total effective dose in a year;
  - (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
  - (iii) Cumulative total effective dose.
- (6) Maintained to include the equivalent dose to the embryo/fetus of a declared pregnant worker.

<b>10 CFR 835: 702(d).01</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*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 documenting previous occupational dose during the year cannot be obtained, a written estimate signed by the individual may be accepted to demonstrate compliance.*

**COMMITMENT STATEMENT:**

To demonstrate compliance with 10 CFR 835.202(a), the SWPF Operating Contractor obtains all occupational exposures received during the current year, except for doses resulting from planned special exposures conducted in compliance with 10 CFR 835.204 and emergency exposures authorized in accordance with 10 CFR 835.1302(d). If the SWPF Operating Contractor cannot obtain complete records, then the SWPF Operating Contractor may accept and use a written estimate, signed by the individual, to demonstrate compliance.

<b>10 CFR 835: 702(e)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*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 doses.*

**COMMITMENT STATEMENT:**

For radiological workers whose occupational dose is monitored in accordance with 10 CFR 835.402, the SWPF Operating Contractor will make reasonable efforts to obtain complete records of prior years occupational internal and external doses.

<b>10 CFR 835: 702(f)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*The records specified in this section that are identified with a specific individual shall be readily available to that individual.*

**COMMITMENT STATEMENT:**

The SWPF Operating Contractor makes the records specified in 10 CFR 835.702(f) that are identified with a specific individual readily available to that individual.

<b>10 CFR 835: 702(g)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*Data necessary to allow future verification or reassessment of the recorded doses shall be recorded.*

**COMMITMENT STATEMENT:**

The SWPF Operating Contractor records data necessary to allow future verification or reassessment of the recorded doses.

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<b>10 CFR 835: 702(h)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*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.*

**COMMITMENT STATEMENT:**

The SWPF Operating Contractor will transfer all records required by 10 CFR 835.702(h) to the DOE upon cessation of activities at sites that could cause exposure to individuals.

<b>10 CFR 835: 703(a)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*The following information shall be documented and maintained:*

*Results of monitoring for radiation and radioactive material as required by subparts E and L of this part, except for monitoring required by 10 CFR 835.1102(d).*

**COMMITMENT STATEMENT:**

The SWPF Operating Contractor documents and maintains the results of monitoring for radiation and radioactive material as required by subparts E and L of 10 CFR 835, except for monitoring required by 10 CFR 835.1102(d).

<b>10 CFR 835: 703(b)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*The following information shall be documented and maintained:*

*Results of monitoring used to determine individual occupational dose from external and internal sources.*

**COMMITMENT STATEMENT:**

The SWPF Operating Contractor documents and maintains the results of monitoring used to determine individual occupational dose from external and internal sources.

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<b>10 CFR 835: 703(c)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*The following information shall be documented and maintained:*

*Results of monitoring for the release and control of material and equipment, as required by 10 CFR 835.1101.*

**COMMITMENT STATEMENT:**

The SWPF Operating Contractor documents and maintains the results of monitoring for the release and control of material and equipment, as required by 10 CFR 835.1101.

<b>10 CFR 835: 703(d)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*The following information shall be documented and maintained:*

*Results of maintenance and calibration performed on instruments and equipment, as required by 10 CFR 835.401(b).*

**COMMITMENT STATEMENT:**

The SWPF Operating Contractor documents and maintains the results of maintenance and calibration performed on instruments and equipment as required by 10 CFR 835.401(b).

<b>10 CFR 835: 704(a)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*Training records shall be maintained, as necessary, to demonstrate compliance with 10 CFR 835.901.*

**COMMITMENT STATEMENT:**

The SWPF Operating Contractor maintains training records which demonstrate compliance with Sections 10 CFR 835.901.

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<b>10 CFR 835: 704(b)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*Actions taken to maintain occupational exposures as low as reasonably achievable, including the actions required for this purpose by 10 CFR 835.101, as well as facility design and control actions required by 10 CFR 835.1001, 835.1002, and 835.1003, shall be documented.*

**COMMITMENT STATEMENT:**

The SWPF Operating Contractor documents actions taken to maintain occupational exposures ALARA, including the actions required for this purpose by 10 CFR 835.101, as well as facility design and control actions required by 10 CFR 835.1001, 835.1002, and 835.1003.

<b>10 CFR 835: 704(c)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*Records shall be maintained to document the results of internal audits and other reviews of program content and implementation.*

**COMMITMENT STATEMENT:**

The SWPF Operating Contractor documents and maintains records of the results of internal audits and other reviews of program content and implementation.

<b>10 CFR 835: 704(d)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*Written declarations of pregnancy, including the estimated date of conception, and revocations of declarations of pregnancy shall be maintained.*

**COMMITMENT STATEMENT:**

The SWPF Operating Contractor maintains written declarations of pregnancy, including the estimated date of conception, and revocations of declarations of pregnancy.

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<b>10 CFR 835: 704(e)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*Changes in equipment, techniques, and procedures used for monitoring shall be documented.*

**COMMITMENT STATEMENT:**

The SWPF Operating Contractor documents changes in equipment, techniques, and procedures used for monitoring.

<b>10 CFR 835: 704(f)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*Records shall be maintained as necessary to demonstrate compliance with the requirements of 10 CFR 835.1201 and 835.1202 for sealed radioactive source control, inventory, and source leak tests.*

**COMMITMENT STATEMENT:**

The SWPF Operating Contractor maintains records as necessary to demonstrate compliance with the requirements of 10 CFR 835.1201 and 835.1202 for sealed radioactive source control, inventory, and source leak tests.

<b>10 CFR 835: 801(a)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*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 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.*

**COMMITMENT STATEMENT:**

The SWPF Operating Contractor reports radiation exposure data for individuals monitored in accordance with § 835.402 as specified in §835.801. The SWPF Operating Contractor includes information and data required under § 835.702(c). The SWPF Operating Contractor provides

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each notification and report in writing and includes: 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.

<b>10 CFR 835: 801(b)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*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, shall be provided at the time of termination, if requested.*

**COMMITMENT STATEMENT:**

Upon request from an individual terminating employment, the SWPF Operating Contractor provides records of exposure to that individual as soon as the data are available, but not later than 90 days after termination. The SWPF Operating Contractor provides 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 by the terminating individual to do so.

<b>10 CFR 835: 801(c)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*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 10 CFR 835.402.*

**COMMITMENT STATEMENT:**

The SWPF Operating Contractor will provide, on an annual basis, a radiation dose report to each individual monitored during the year at the site or facility in accordance with 10 CFR 835.402.

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<b>10 CFR 835: 801(d)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*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).*

**COMMITMENT STATEMENT:**

The SWPF Operating Contractor will make available detailed information concerning any individual's exposure to that individual upon request of that individual, consistent with the provisions of the Privacy Act (5 U.S.C. 552a).

<b>10 CFR 835: 801(e)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*When a DOE contractor is required to report to the Department, pursuant to Departmental requirements for occurrence reporting and processing, any exposure of an 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.*

**COMMITMENT STATEMENT:**

When the SWPF Operating Contractor is required to report to the DOE, pursuant to Departmental requirements for occurrence reporting and processing, any exposure of an individual to radiation and/or radioactive material, or planned special exposure in accordance with § 835.204(e), the SWPF Operating Contractor will also provide that individual with a report on his or her exposure data included therein. The SWPF Operating Contractor will transmit this report at a time not later than the transmittal to the DOE.

<b>10 CFR 835: 901(a)(1) and (2)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*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:*

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- (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.*

**COMMITMENT STATEMENT:**

The SWPF Operating Contractor ensures each individual completes radiation safety training on the topics established in 10 CFR 835.901(c) commensurate with the hazards in the area and the required controls is provided:

- (1) Before being permitted unescorted access to controlled areas; and
- (2) Before receiving occupational dose during access to controlled areas at a SWPF operated site or facility.

<b>10 CFR 835: 901(b)(1) and (2)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*Each individual shall demonstrate knowledge of the radiation safety 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:*

- (1) Before being permitted unescorted access to radiological areas; and*
- (2) Before performing unescorted assignments as a radiological worker.*

**COMMITMENT STATEMENT:**

The SWPF Operating Contractor requires each individual to demonstrate knowledge of the radiation safety training topics established in 10 CFR 835.901(c), commensurate with the hazards in the area and required controls, by successful completion of an examination and performance demonstrations:

- (1) Before being permitted unescorted access to radiological areas; and
- (2) Before performing unescorted assignments as a radiological worker.

<b>10 CFR 835: 901(c)(1)-(6)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*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:*

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- (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 doses ALARA, including both routine and emergency actions;*
- (4) Individual rights and responsibilities as related to implementation of the facility radiation protection program;*
- (5) Individual responsibilities for implementing ALARA measures required by § 835.101; and*
- (6) Individual exposure reports that may be requested in accordance with § 835.801.*

**COMMITMENT STATEMENT:**

The SWPF Operating Contractor ensures radiation safety training includes 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 doses ALARA, including both routine and emergency actions;
- (4) Individual rights and responsibilities as related to implementation of the facility radiation protection program;
- (5) Individual responsibilities for implementing ALARA measures required by § 835.101; and
- (6) Individual exposure reports that may be requested in accordance with § 835.801.

<b>10 CFR 835: 901(d)(1) and (2)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*When an escort is used in lieu of training in accordance with paragraph (a) or (b) of this section, the escort shall:*

- (1) Have completed radiation safety training, examinations, and performance demonstrations required for entry to the area and performance of the work; and*
  - (2) Ensure that all escorted individuals comply with the documented radiation protection program.*
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**COMMITMENT STATEMENT:**

When the SWPF Operating Contractor uses an escort used in lieu of training in accordance with 10 CFR 835.901(a) and 835.901(b), the escort will have completed radiation safety training, examinations, and performance demonstrations required for entry to the area and performance of the work. The SWPF Operating Contractor ensures that all escorted individuals comply with this RPP.

<b>10 CFR 835: 901(e)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*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 (b)(2) shall include successful completion of an examination.*

**COMMITMENT STATEMENT:**

The SWPF Operating Contractor will ensure radiation safety training is 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. The SWPF Operating Contractor ensures training for individuals subject to the requirements of § 835.901(b)(1) and (b)(2) and this training requires the successful completion of an examination.

<b>10 CFR 835: 1001(a).01</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*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.*

**COMMITMENT STATEMENT:**

The SWPF Operating Contractor will apply measures to maintain radiation exposure in controlled areas ALARA through engineered and administrative controls. The primary methods used by the SWPF Operating Contractor are engineered controls (e.g., confinement, ventilation, remote handling, and shielding). The SWPF Operating Contractor uses administrative controls only as supplemental methods to control radiation exposure.

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<b>10 CFR 835: 1001(b)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*For specific activities where use of engineered controls is demonstrated to be impractical, administrative controls shall be used to maintain radiation exposures ALARA.*

**COMMITMENT STATEMENT:**

For specific activities where use of physical design features is demonstrated to be impractical, administrative controls will be used to maintain radiation exposures ALARA.

<b>10 CFR 835: 1002(a)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*During the design of new facilities or modification of existing facilities, the following objectives shall be adopted:*

- (a) Optimization methods shall be used to assure that occupational exposure is maintained ALARA in developing and justifying facility design and physical controls.*

**COMMITMENT STATEMENT:**

During the design of new facilities or modification of existing facilities, the SWPF Operating Contractor will use optimization methods to assure that occupational exposure is maintained ALARA when developing or justifying facility design and physical controls.

<b>10 CFR 835: 1002(b)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*During the design of new facilities or modification of existing facilities, the following objectives shall be adopted:*

- (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 (mRem) (5  $\mu$ 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 differs from the above shall be ALARA and shall not exceed 20 percent of the applicable standards in § 835.202.*
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**COMMITMENT STATEMENT:**

During the design of new facilities or modification of existing facilities, the following objectives shall be adopted: The design objective, used by the SWPF Operating Contractor, for controlling personnel exposure from external sources of radiation in areas of continuous occupational occupancy (2,000 hours per year) is to maintain exposure levels below an average of 0.5 mRem (5  $\mu$ Sv) per hour and as far below this average as is reasonably achievable. The design objectives, used by the SWPF Operating Contractor, for exposure rates for potential exposure to a radiological worker where occupancy differs from the 2,000 hours per year is ALARA and to not exceed 20 percent of the applicable standards in §835.202.

<b>10 CFR 835: 1002(c)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*During the design of new facilities or modification of existing facilities, the following objectives shall be adopted: Regarding the control of airborne radioactive material, the design objective shall be, under normal conditions, to avoid 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.*

**COMMITMENT STATEMENT:**

Regarding the control of airborne radioactive material, the design objective used by the SWPF Operating Contractor is, under normal conditions, to avoid releases to the workplace atmosphere and in any situation, to control the inhalation of such material by workers to levels that are ALARA.

<b>10 CFR 835: 1002(d)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*During the design of new facilities or modification of existing facilities, the following objectives shall be adopted: The design or modification of a facility and the selection of materials shall include features that facilitate operations, maintenance, decontamination, and decommissioning.*

**COMMITMENT STATEMENT:**

During the design of new facilities or modification of existing facilities, the SWPF Operating Contractor will select materials which include features that facilitate operations, maintenance, decontamination, and decommissioning.

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<b>10 CFR 835: 1003(a)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*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 at 10 CFR 835.202; and*

**COMMITMENT STATEMENT:**

During routine operations, the combination of engineered and administrative controls will limit the occupational dose to general employees to less than the limits established in 10 CFR 835.202.

<b>10 CFR 835: 1003(b)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*During routine operations, the combination of engineered and administrative controls shall provide that: The ALARA process is utilized for personnel exposures to ionizing radiation.*

**COMMITMENT STATEMENT:**

During routine operations, the combination of engineered and administrative controls will provide that the ALARA process is utilized for personnel exposures to ionizing radiation.

<b>10 CFR 835: 1101(a)(1 and 2)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*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 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.*
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**COMMITMENT STATEMENT:**

Except as provided in paragraphs (b) and (c) of this 10 CFR 835.1101, the SWPF Operating Contractor will not release material and equipment in contamination areas, high contamination areas, and airborne radioactivity areas 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.

<b>10 CFR 835: 1101(b)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*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 radiological area only if appropriate monitoring is performed and appropriate controls for the movement are established and exercised.*

**COMMITMENT STATEMENT:**

The SWPF Operating Contractor may choose to conditionally release material and equipment exceeding the removable surface contamination values specified in 10 CFR 835, Appendix D for movement onsite from one radiological area for immediate placement in another radiological area, if appropriate monitoring is performed and appropriate controls for the movement are established and exercised.

<b>10 CFR 835: 1101(c)(1) and (2)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*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 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.*
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**COMMITMENT STATEMENT:**

The SWPF Operating Contractor may choose to release and use material and equipment with fixed contamination levels that exceed the total surface contamination values specified in appendix D of 10 CFR 835 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 D of 10 CFR 835; and
- (2) The material or equipment is routinely monitored and clearly marked or labeled to alert personnel of the contaminated status.

Material and equipment with fixed contamination levels that exceed the total surface contamination values specified in 10 CFR 835 Appendix D may be released for use in controlled areas outside of the radiological areas if the removable surface contamination values are below the values specified in Appendix D.

<b>10 CFR 835: 1102(a)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*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.*

**COMMITMENT STATEMENT:**

The SWPF Operating Contractor maintains and verifies appropriate controls which prevent the inadvertent transfer of removable contamination to locations outside of radiological areas under normal operating conditions.

<b>10 CFR 835: 1102(b)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*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.*

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**COMMITMENT STATEMENT:**

The SWPF Operating Contractor controls any area in which contamination levels exceed the values specified in Appendix D of 10 CFR 835 in a manner commensurate with the physical and chemical characteristics of the contaminant, the radionuclides present, and the fixed and removable contamination levels.

<b>10 CFR 835: 1102(c)(1) and (2)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*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) The area shall be conspicuously marked to warn individuals of the contaminated status.*

**COMMITMENT STATEMENT:**

For areas, located outside of radiological areas, which are 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 10 CFR 835, the SWPF Operating Contractor ensures that:

- (1) The area is routinely monitored to ensure the removable surface contamination level remains below the removable surface contamination values specified in appendix D of 10 CFR 835; and
- (2) The area is conspicuously marked to warn individuals of the contaminated status.

<b>10 CFR 835: 1102(d)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*Individuals exiting contamination, high contamination, or airborne radioactivity areas shall be monitored, as appropriate, for the presence of surface contamination.*

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**COMMITMENT STATEMENT:**

The SWPF Operating Contractor will monitor for the presence of surface contamination, as appropriate, individuals exiting contamination, high contamination, or airborne radioactivity areas.

<b>10 CFR 835: 1102(e)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*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.*

**COMMITMENT STATEMENT:**

The SWPF Operating Contractor requires protective clothing for entry into areas in which removable contamination exists at levels exceeding the removable surface contamination values specified in Appendix D of 10 CFR 835.

<b>10 CFR 835: 1201</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*Sealed radioactive sources shall be used, handled, and stored in a manner commensurate with the hazards associated with the operations involving the sources.*

**COMMITMENT STATEMENT:**

The SWPF Operating Contractor will use, handle and store sealed radioactive sources in a manner commensurate with the hazards associated with the operations involving the sources.

<b>10 CFR 835: 1202(a)(1) – (3)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*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*
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(3) *Establish the adequacy of storage locations, containers, and devices.*

**COMMITMENT STATEMENT:**

The SWPF Operating Contractor will inventory each accountable sealed radioactive source at intervals not to exceed six months. This inventory will:

- (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.

<b>10 CFR 835: 1202(b)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*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  $\mu\text{Ci}$ .*

**COMMITMENT STATEMENT:**

Except for sealed radioactive sources consisting solely of gaseous radioactive material or tritium, the SWPF Operating Contractor will perform a source leak test on each accountable sealed radioactive source upon receipt, when damage is suspected, and at intervals not to exceed six months. The leak tests performed by the SWPF Operating Contractor are capable of detecting radioactive material leakage equal to or exceeding 0.005  $\mu\text{Ci}$ .

<b>10 CFR 835: 1202(c)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*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.*

**COMMITMENT STATEMENT:**

Notwithstanding the requirements of paragraph (b) of this § 835.1202, the SWPF Operating Contractor does not subject an accountable sealed radioactive source to periodic source leak testing if that source has been removed from service. In this instance, the SWPF Operating

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Contractor will ensure that such sources are stored in a controlled location, subject to periodic inventory as required by paragraph (a) of § 835.1202, and subject to source leak testing prior to being returned to service.

<b>10 CFR 835: 1202(d)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*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.*

**COMMITMENT STATEMENT:**

Notwithstanding the requirements of paragraphs (a) and (b) of § 835.1202, the SWPF Operating Contractor does not subject an accountable sealed radioactive source to periodic inventory and source leak testing if that source is located in an area that is unsafe for human entry or otherwise inaccessible.

<b>10 CFR 835: 1202(e)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*An accountable sealed radioactive source found to be leaking radioactive material shall be controlled in a manner that minimizes the spread of radioactive contamination.*

**COMMITMENT STATEMENT:**

The SWPF Operating Contractor will control an accountable sealed radioactive source found to be leaking radioactive material in a manner that minimizes the spread of radioactive contamination.

<b>10 CFR 835: 1301(a)(1) – (3)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*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:*

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- (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 employee agrees to return to radiological work.*

**COMMITMENT STATEMENT:**

The SWPF Operating Contractor may choose to allow 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, to return to work in radiological areas during the current year when 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 employee agrees to return to radiological work.

<b>10 CFR 835: 1301(b)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*All doses exceeding the limits specified in § 835.202 shall be recorded in the affected individual's occupational dose record.*

**COMMITMENT STATEMENT:**

The SWPF Operating Contractor records all doses exceeding the limits specified in 10 CFR 835.202 in the affected individual's occupational dose record.

<b>10 CFR 835: 1301(c)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*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.*

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**COMMITMENT STATEMENT:**

When the conditions under which a dose was received in excess of the limits specified in 10 CFR 835.202, except those doses received in accordance with 10 CFR 835.204, have been eliminated, the SWPF Operating Contractor management will notify the Head of the responsible DOE field organization.

<b>10 CFR 835: 1301(d)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*Operations which have been suspended as a result of a dose in excess of the limits specified in § 835.202, except those received in accordance with §835.204, may be resumed only with the approval of DOE.*

**COMMITMENT STATEMENT:**

The SWPF Operating Contractor will have approval from the DOE prior to resuming operations which have been suspended as a result of a dose in excess of the limits specified in §835.202, except those received in accordance with §835.204.

<b>10 CFR 835: 1302(a)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*The risk of injury to those individuals involved in rescue and recovery operations shall be minimized.*

**COMMITMENT STATEMENT:**

The SWPF Operating Contractor will take steps to minimize the risk of injury to those individuals involved in rescue and recovery operations.

<b>10 CFR 835: 1302(b)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*Operating management shall weigh actual and potential risks against the benefits to be gained.*

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**COMMITMENT STATEMENT:**

The SWPF Operating Contractor will weigh actual and potential risks against the benefits to be gained.

<b>10 CFR 835: 1302 (c)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*No individual shall be required to perform rescue action that might involve substantial personal risk.*

**COMMITMENT STATEMENT:**

The SWPF Operating Contractor will only use volunteers to perform rescue actions that might involve substantial personal risk.

<b>10 CFR 835: 1302(d)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*Each individual authorized to perform emergency actions likely to result in occupational doses exceeding the values of the limits provided at 10 CFR 835.202(a) shall be trained in accordance with 10 CFR 835.901(b) and briefed beforehand on the known or anticipated hazards to which the individual will be subjected.*

**COMMITMENT STATEMENT:**

The SWPF Operating Contractor will train each individual authorized to perform emergency actions likely to result in occupational doses exceeding the values of the limits provided at 10 CFR 835.202(a), in accordance with 10 CFR 835.901(b), and will brief them beforehand on the known or anticipated hazards to which they will be exposed.

Note: 10 CFR 835 Section 1303 is a reserved section with no regulatory requirements.

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<b>10 CFR 835: 1304(a)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*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.*

**COMMITMENT STATEMENT:**

The SWPF Operating Contractor will provide nuclear accident dosimetry to monitor personnel exposure should a nuclear accident occur.

<b>10 CFR 835: 1304(b)(1) – (4)</b>	Scheduled Implementation for Full Compliance: HOT COMMISSIONING
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**REQUIREMENT STATEMENT:**

*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.*

**COMMITMENT STATEMENT:**

SWPF Operating Contractor will ensure the dosimetry program and specifically nuclear accident dosimetry includes:

- (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.
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**REFERENCES**

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- <sup>1</sup> S-RCP-J-00001, *Salt Waste Processing Facility Project Standards/Requirements Identification Document*. Parsons, Aiken, South Carolina.
  - <sup>2</sup> 10 CFR 835, Energy: Chapter III: Department of Energy: *Occupational Radiation Protection*. Revised January 1, 2007; Amended January 30, 2015.
  - <sup>3</sup> DE-AC09-02SR22210, *Design, Construction, Testing and Cold Commissioning, and Commissioning of a Salt Waste Processing Facility (SWPF)*. U. S. Department of Energy. 2002.
  - <sup>4</sup> DOE G 441.1-1C, Admin Chg 1, *Radiation Protection Programs Guide for use with Title 10, Code of Federal Regulations, Part 835, Occupational Radiation Protection*. U.S. Department of Energy, Washington, D.C. Approved May 19, 2008. Last updated July 8, 2011.
  - <sup>5</sup> PL-RP-4500, *SWPF Radiation Protection Program Plan for 10 CFR 835 Occupational Radiation Protection Program*. Parsons, Aiken, South Carolina.
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