

Take 5 for Safety

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BROOKHAVEN
NATIONAL LABORATORY

a passion for discovery



Radiological Posting Issue Summary

- Accelerator Posting of Enclosures:
 - Post for beam-off or non-fault conditions
 - SC community argues enclosures or beams are “*inaccessible*” during operations, therefore posting for beam-on or fault conditions not required
 - Accepted practice over last 15 years
 - SC labs assume they are in compliance with 10CFR835

Posting – Significant Issues (HMI, Cost, Up/Down Posting, Etc.)

- 10CFR835 § 835.2 Controlled area means any area to which access is managed by or for DOE to protect individuals from exposure to radiation and/or radioactive material
- § 835.602 Controlled areas
 - Each access point to a controlled area (as defined in § 835.2) shall be posted whenever radiological areas or radioactive material areas exist in the area...
- § 835.603 Radiological areas and radioactive material areas
 - Each access point to radiological areas and radioactive material areas (as defined at § 835.2) shall be posted with conspicuous signs bearing the wording provided in this section...

Radiological Posting Issue Summary

- 10CFR835 does not define *accessible* or *inaccessible*
- Current DOE Accelerator Guide – contains weak statement on accessibility
- New (draft) Guide – Explicitly addresses stance on accessibility/posting
- DOE General Council (GC) non-concurred on accessibility/posting language in new (draft) Guide

ISSUE: How Best To Respond To GC Non-concurrence On Draft Guide?

- Background - Much has been said and written about accelerator posting issue over last 3 years
 - JLAB – HSS threatened violation, but withdrew prior to issuance (2011)
 - ASW 2011 sessions w/GC and HSS, White Paper, etc.
 - Discussions between General Council, SC, and Joe McBrearty (DOE Deputy Director for Field Operations)
 - NNSA is not supportive (LANL, SANDIA up/down post)
- New (draft) Guide – needed, supported by SC and NNSA, in use for many practices (ARR, ASE, USI)

Option 1 – Attempt To Retain Current Language

- Strategy
 - C-AD management motivates BNL DDO Jack Anderson to action
 - Jack Anderson coordinates with other SC COOs
 - COOs lobby McBrearty
 - McBrearty motivated to confront General Council
 - McBrearty takes Guide to impasse process, wins impasse decision

Option 2 – Remove Paragraph From Draft Guide – Go Mute

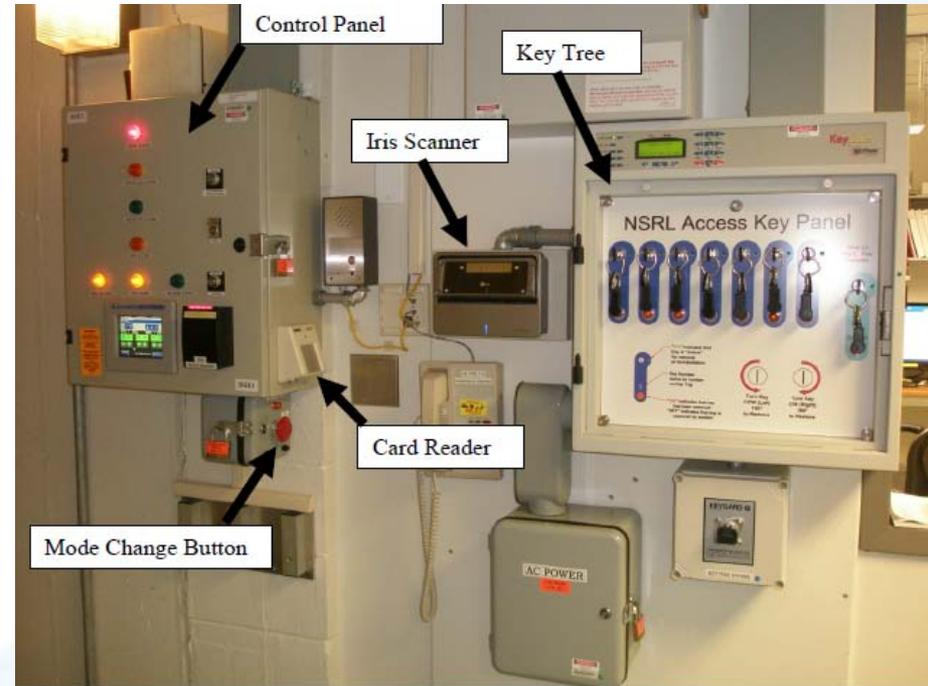
- Option 2a - Wait and See
 - SC Accelerator Community believes we are in compliance with 835
 - Don't fight issue now – wrong forum, heels dug in
 - Fight the battle when/if we are challenged
 - Inform COOs
 - Prepare for challenge
 - Unify SC Accelerators – agree to approach
- Option 2b – Pursue BNL exemption from 835
- Option 2c – Pursue programmatic exemption – Some in SC have expressed support - it is thought McBrearty will not
- Option 2d – BNL self-declares 835 violation – develop Implementation Plan

Photos of the Week

Accessible?



Inaccessible?



Photos of the Week

Accessible?



Inaccessible?



1000 Acre Scale of Issue for C-AD

