



## Physics Division ESH Bulletin 99-8

# RADIOLOGICAL FACILITIES AND THE QUALITY RULE

CTD ESH&Q Training Group ♦ A.F. Frederick (576-1460) ♦ December 1999 ♦ RPB-103

Beginning January 1, 2000, the requirements of the Quality Rule, 10 CFR 830.120, "Quality Assurance Requirements", are applicable not only to ORNL's nuclear facilities, but to ORNL's radiological facilities and activities (including support activities for design, procurement, and inspection and testing) as well! These requirements are specified in ORNL-QA-PO2, "ORNL Nuclear Quality Assurance Program".

### *What does this mean to you?*

Appropriate work process controls must be implemented in nuclear facilities, radiological facilities, and radiological activities, regardless of location. These are determined by using the graded approach in accordance with the degree of risk associated with the facility or activity. Strict adherence to ORNL's Radiation Protection Procedures, which already incorporate a graded approach from 10 CFR 835, is sufficient to assure adequate controls for radiological work.

Factors used in evaluating risk potential are:

the potential hazards involved;  
the relative importance to safety, safeguards, and security;  
the qualifications of the facility and support organization staff in performing the activities



The company and/or the employee can be subject to penalties addressed by the Price - Anderson Amendment Act (P-AAA).

### *Examples of Potential P-AAA Issues*

- 1 - Personnel training and qualification: Do all participating personnel (including guest users) have the required radiological training? Is it current?
- 2 - Adherence to procedures: Are procedures current? Are you complying with procedures?
- 3 - Work Control Processes: Is there a Radiological Work Permit for your job? Has it expired? Is it being specifically followed? Does it specifically cover the work? Is work planning appropriate to the task?
- 4 - Radiological Practices: Do you have equipment or wiring crossing posted boundaries? Are you removing your anti-C clothing according to your training? Are you following instructions on frisking? Have you informed the HP of activities you performed which might change the posting of the area? Have items being removed from the area been properly surveyed?

(over)

*Contact the following for questions concerning:*

10 CFR 835, "Occupational Radiation Protection" - Division Radiological Control Officer, Facility HP,  
or Ron Mlekodaj (574-4996)

ORNL Price-Anderson Program - Mike Walls

ORNL's Nuclear Quality Assurance Program  
or the Quality Rule - Division QA Specialist

Required training - Division Training Officer

Rad Worker classes - Chemical Technology ESH&Q Training