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	Safety	
	RADIOLOGICAL SAFETY	
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CESO

Regulation No. 385-1-80

30 May 1997

Safety IONIZING RADIATION PROTECTION

This is a complete revision of ER 385-1-80. Engineer Manual(EM) 385-1-80, Radiation Protection Manual, further prescribes and details the requirements contained in this ER.

- 1. <u>Purpose</u>. This regulation assigns safety and health responsibilities to:
- a. Safely and effectively use radioactive materials and radiation generating devices.
- b. Ensure compliance with all applicable Federal, Department of Army (DA), USACE, state and local regulations (that is, "applicable regulations") concerning the safe use of radiation, radioactive materials or radiation generating devices. Guidance concerning the safe use of non-ionizing radiation sources (such as lasers and radio frequency radiation) can be found in EM 385-1-80 (USACE Radiation Protection Manual).
- c. Obtain, renew, amend and terminate Nuclear Regulatory Commission (NRC) licenses and Army Radiation Authorizations (ARAs) for possession and use of radioactive materials and radiation generating devices not requiring licenses from the NRC.
 - d. Transfer or dispose of radioactive materials and wastes.
- e. Oversee contractors using radioactive materials or radiation generating devices that require NRC or agreement state licensing or registration, installation permits or ARAs for possession or use of radioactive materials or radiation generating devices.
- f. Oversee contractors performing remediation of sites contaminated with radioactive material or radioactive waste.

This regulation supersedes ER 385-1-80, 7 May 1982

- 2. Applicability. This regulation applies to all USACE Commands; Divisions, Districts, Laboratories, and Field Operating Activities (FOAs); which procure, use, possess, transport, transfer or dispose of radioactive materials or radiation generating devices, or oversee remediation of radioactive materials or radioactive waste. The USACE Safety and Health Requirements Manual, EM 385-1-1, contains contractor requirements concerning radiation safety issues.
- 3. References. References are listed in Appendix A.
- 4. Definitions. Definitions are listed in Appendix B.
- 5. Responsibilities.
- a. The Chief, Safety and Occupational Health Office (CESO), Headquarters, USACE, (HQUSACE) is responsible for program management and oversight for licensing, accountability, possession, use, storage, transfer and disposal of all radioactive material and radiation generating devices within USACE. This responsibility shall be discharged by:
- (1) Appointing and maintaining on staff a qualified Radiation Protection Staff Officer (RPSO);
- (2) Assuring USACE Command implementation of Department of Army (DA) and USACE radiation protection policy.
- b. On behalf of USACE, the Radiation Protection Staff Officer (RPSO) is responsible for:
- (1) Serving as a primary focal point for coordination with other Federal Agencies, Department of Defense and DA officials concerning radiation safety issues and providing radiation safety consultation in coordination with the HTRW Center of Expertise (CX) to USACE Commands.
- (2) Providing coordination, administration and technical review of all USACE applications, renewals, amendments and terminations of all NRC licenses and ARAs for the possession, use, transportation, transfer or disposal of non-NRC licensed radioactive material and radiation generating devices, and maintaining liaison with the US Nuclear Regulatory Commission.

- (3) Providing recordkeeping for all paperwork and correspondence regarding applications, renewals, amendments and terminations of authorization for the possession, use, transportation, transfer or disposal of NRC licensed and non-NRC authorized radioactive material and radiation generating devices.
- (4) Providing (may be through a designee) Radiation Protection Audits to all locations possessing an NRC license or an Army Radiation Authorization (ARA) for radioactive material or radiation generating devices, at least on a triennial basis.
- c. The Commander or Director of any USACE Command, which procures, uses, possesses, transports, transfers, disposes of NRC general or specifically licensed, or ARA listed radioactive materials or radiation generating devices, or oversees contractors working with radioactive materials or radiation generating devices, is responsible for:
- (1) Appointing, funding and maintaining a qualified Radiation Protection Officer (RPO) (may be designated as a Radiation Safety Officer (RSO) in other documents) upon recommendation from the RPSO, and supporting decisions of the RPO.
- (2) Establishing written policies and a formal radiation protection program ensuring compliance with this and all applicable regulations, license or permit conditions.
- (3) Maintaining adequate resources to assure the safety of personnel, property and the environment, and to cope with emergencies.
- (4) Ensuring that all personnel who may be exposed to ionizing radiation receive appropriate radiation protection training. The adequacy of the training shall be determined by the RPO with concurrence of the RPSO.
- (5) Establishing, funding, maintaining, and supporting a Radiation Protection Committee (RPC) if warranted by a specific NRC license or ARA condition.
- (6) Obtaining all required USACE licenses, authorizations and permits (NRC and Army) prior to procurement, use, transfer, or disposal of radioactive materials or radiation generating devices.

- (7) Ensuring annual audits are conducted to determine compliance with all Federal, DA, USACE, state and local license or ARA conditions.
- (8) Establishing procedures to assure that the local Safety and Occupational Health Office is advised prior to any change in the use of radioactive materials or radiation generating devices and that the RPO evaluates the procedures and hazards prior to utilization of radioactive materials or radiation generating devices.
- d. The Chief, Safety and Occupational Health Office (SOHO) of any USACE Command, which procures, uses, possesses, transports, transfers, disposes of radioactive materials or radiation generating devices, or oversees contractors working with radioactive materials or radiation generating devices, including non-ionizing radiation sources, is responsible for:
- (1) Assuring the radiation protection component of the Command's Safety and Occupational Health Program complies with all applicable regulations.
- (2) Providing coordination, administration and technical review and approval of all USACE applications, renewals, amendments and terminations of NRC licenses and ARA's, including possession, use, transportation, transfer and disposal.
- (3) Assuring that USACE personnel including Authorized Users and Authorized User's Assistants and are adequately instructed in the safe use of radiation and their duties and responsibilities under this regulation.
- (4) Reviewing equipment, materials, facilities, operations and procedures and advising the Commander of any unsafe practices, defects or non-compliance with applicable regulations.
- (5) Providing, upon request from contractors, the proper procedures for obtaining service permits or authorizations for use of radioactive materials or radiation generating devices on DOD installations.
- e. The USACE Radiation Protection Officer (RPO) for each USACE Command is responsible for:

- (1) Preparing and submitting to the RPSO, through USACE channels (see paragraph 7) within assigned time frames, all applications, amendments or submittals necessary for compliance with all applicable regulations concerning radioactive materials or radiation generating devices.
- (2) Ensuring that all exposures of workers and the general public to ionizing radiation are kept as low as is reasonably achievable (ALARA), with technical and socioeconomic factors being taken into account. This shall be accomplished by ensuring compliance with all applicable regulations concerning radioactive materials or radiation generating devices by all users of radioactive materials or radiation generating equipment.
- (3) Providing competent technical guidance for all users of radioactive material or radiation generating devices.
- (4) With the concurrence of the RPSO, determining the appropriate training for all personnel who may be exposed to ionizing radiation.
- (5) Ensuring that all personnel who may be exposed to ionizing radiation, including occupationally exposed personnel (radiation workers) and frequenters (individuals who are likely to receive an exposure of 100 millirem per year, such as janitorial staff) to areas where radiation is present, receive the appropriate training.
- (6) Maintaining all documents, correspondence, reports, and records that this regulation and other applicable Federal and Army regulations, licenses, and authorizations may require.
- (7) Disseminating all guidance and providing services as described in this regulation.
- (8) Auditing activities involving radioactive materials or radiation generating devices within their USACE Command on an annual basis.
- (9) Providing timely reports to the Commander or Director of his or her USACE Command, of the current status of activities involving radioactive material or radiation generating devices.
- (10) Providing external and internal dosimetry to USACE personnel as needed, and as described in paragraph 11 of this ER.

- f. All USACE personnel, who procure, use, possess, transport, transfer or dispose of radioactive materials or radiation generating devices, or oversee contractors working with radioactive materials or radiation generating devices, are responsible for:
- (1) Having knowledge of and complying with all applicable regulations concerning radioactive materials or radiation generating devices with which they work. This will be accomplished through training designated by the RPO.
- (2) Performing their duties involving radioactive materials and radiation generating devices in a safe manner, in compliance with all applicable regulations, and in such a way as to promote maintaining doses ALARA.
- (3) Ensuring that others performing work with radioactive materials or radiation generating devices, under their supervision, do so in a safe manner and in compliance with all applicable regulations, and in such a way as to promote maintaining doses ALARA.
- (4) Informing the RPO, in a timely manner, of all procurement, possession, use, transfer, disposal, loss, theft, or other reportable occurrence involving radioactive materials or radiation generating equipment.

6. <u>Authorized Users</u>, <u>Authorized Users</u>, <u>Assistants and</u> <u>Qualifications</u>.

- a. Authorized Users (AUs) are individuals allowed to work unsupervised with radioactive materials or radiation generating devices. AUs will receive training commensurate with the hazard presented by their work. The RPO in conjunction with the RPSO will determine the content and extent of the training (details concerning training requirements are contained in EM-385-1-80).
- b. Authorized Users' Assistants (AUAs) are individuals allowed to work with radioactive materials or radiation generating devices under the direct supervision (that is, within the physical presence) of an AU. AUAs will receive training commensurate with the hazard presented by their work. The RPO, in conjunction with the RPSO, will determine the content and extent of the training (details concerning training requirements are contained in EM 385-1-80).

7. Information Flow through Applicable USACE Channels.

- a. All NRC license or ARA applications, approvals, amendments, submittals, terminations, etc., must be routed through all Safety and Occupational Health Office channels (that is, "through channels"), prior to being received for action by the HQUSACE RPSO. For example: a request to obtain an NRC license amendment would flow from the local RPO, through the local SOHO, through the Division SOHO to the HQUSACE RPSO for action. Actions would be forwarded from the HQUSACE RPSO in reverse order.
- b. Failure to follow the information flow process is a violation of the USACE delegation requirements specified by the DA. Technical consultations between NRC Offices and license holders at USACE Commands may take place, though notification of the RPSO of such communications is recommended.

8. Notices, Instructions and Reports to Workers.

- a. The RPO will file in his or her office, current copies of the following:
- (1) 10 CFR 19 Notices Instructions and Reports to Workers: Instructions and Investigations;
 - (2) 10 CFR 20 Standards for Protection Against Radiation;
- (3) 10 CFR 30 Rules of General Applicability to Domestic Licensing of Byproduct Material;
- (4) 10 CFR 31 General Domestic Licenses for Byproduct Material;
 - (5) ER 385-1-80 Ionizing Radiation Protection;
- (6) EM 385-1-80 Radiation Protection Manual and EM 385-1-1, Safety and Health Requirements Manual;
- (7) A copy of all NRC licenses and Army Radiation Authorizations (ARAs) with all attachments, all amendments to licenses or ARAs, and all associated correspondence;
 - (8) A copy of the commands' radiation protection program;

- (9) All Standing Operating Procedures (SOPs) applicable to working with radiation within their Command.
- (10) Copies of any notice of violation of license or ARA requirements.
 - (11) Copies of DA regulations, AR 385-11, AR 40-5, AR 40-14.
- b. The RPO will post the following documents, in enough conspicuous locations to ensure that all personnel working with radiation can observe them:
- (1) a notice that all documents listed in Paragraph 8.a. above, are located in the RPO's office, and may be examined during working hours by all personnel working with radiation.
- (2) a copy of NRC Form 3, Notice to Employees (Appendix C) dated no earlier than 1/96.

9. Dose Limits.

- a. To ensure compliance with all regulatory agencies, USACE has established a three tiered approach to worker dose limits. Each user of radioactive material or radiation generating devices shall limit occupational doses to individuals to the following limits:
- (1) Tier 1 limits. USACE personnel shall never exceed an annual dose which is the more limiting of:
- (a) 5 rems (5000 millirem (mrem))(0.05 sieverts (Sv)) total effective dose equivalent (TEDE), or
- (b) The sum of the deep dose equivalent and the committed dose equivalent (CDE) to any individual organ or tissue of 50 rems (50000 mrem)(0.5 Sv), or
 - (c) 15 rems (15000 mrem)(0.15 Sv) to the lens of the eye, or
- (d) 50 rems (50000 mrem)(0.5 Sv) shallow dose equivalent to the skin, or any extremity.
- (e) The TEDE to the fetus of a declared pregnant worker will be kept below 0.5 rem (500 mrem)(0.005 Sv) during the entire gestation period. Should the fetus have received greater than 0.5

rem, when the worker declares her pregnancy the fetus will be limited to an additional exposure of no more than 0.05 rem during the remaining gestation period.

- (2) Tier 2 USACE annual dose limits. Without the written approval of the Radiation Protection Staff Officer (RPSO) the annual occupational dose shall not exceed the more limiting of:
 - (a) 0.5 rems (500 mrem)(0.005 Sv) TEDE, or
- (b) The sum of the deep dose equivalent and the committed dose equivalent to any individual organ or tissue of 5 rems (5000 mrem)(0.05 Sv), or
- (c) 1.5 rems (1500 mrem)(0.015 Sv) to the lens of the eye, or
- (d) 5 rems (5000 mrem)(0.05 Sv) shallow dose equivalent to the skin, or any extremity.
- (e) The TEDE to the fetus of a declared pregnant worker will be kept below 0.5 rem (500 mrem)(0.005 Sv) during the entire gestation period. Should the fetus have received greater than 0.5 rem, when the worker declares her pregnancy the fetus will be limited to an additional exposure of no more than 0.05 rem during the remaining gestation period.
- (3) Tier 3 project specific dose goals. To keep doses ALARA, the RPO shall set administrative action levels specific to each individual project, below the USACE annual dose limits. The ALARA action levels shall be realistic and attainable. ALARA action levels can be set at any level, but need to take the particulars of each project into account. Example action levels for a small project involving little radioactive material could be:

Dose shall not exceed the limiting of:

- (a) 0.1 rems (0.001 Sv) TEDE, or
- (b) The sum of the deep dose equivalent and the committed dose equivalent (CDE) to any individual organ or tissue of 0.5 rems (0.005 Sy), or
 - (c) 0.15 rems (0.0015 Sv) to the lens of the eye, or

(d) 0.5 rems (0.005 Sv) shallow dose equivalent to the skin, or any extremity.

Table 9-1
Dose Limits

Body Part	NRC Annual Limits	USACE Annual Limits	Example Annual ALARA Limits
Whole Body	5 rem	0.5 rem	0.1 rem
Individual Organ	50 rem	5.0 rem	0.5 rem
Lens of Eye	15 rem	1.5 rem	0.15 rem
Skin	50 rem	5.0 rem	0.5 rem

- b. Planned special exposures (see definitions, Appendix B) shall not be used without the written consent of the RPSO.
- c. Persons under the age of 18 shall not be allowed occupational exposure to radiation on USACE sites.
- d. Activities with radiation shall be conducted so that USACE personnel who are not working with radiation and members of the public can not receive a TEDE exceeding 100 mrem per year.
- e. The dose in any unrestricted area will not exceed 2 mrem in any one hour.

10. Surveys and Monitoring.

- a. The RPO will ensure that adequate surveys and monitoring are performed to ensure compliance with the above dose limits in an accurate and timely manner, and are properly recorded and filed.
- b. The RPO will ensure that all instruments and equipment used for quantitative radiation measurements are calibrated at least annually or as directed by regulations, license or ARA conditions, or manufacturer's recommendations.

- c. The RPO will monitor all areas where there is a potential for external radiation. Where the potential for exposure that would cause a dose equal to the Tier 2 USACE Dose limits exists and for all personnel entering high or very high radiation areas, the RPO will provide external dosimetry for all personnel entering the area.
- d. The RPO will monitor all areas where there is a potential for internal contamination. Where the potential for intake of radionuclides causing a dose equal to the Tier 2 USACE Dose limits exists, the RPO will provide internal dosimetry (bioassay) services for all personnel entering the area.

11. Personnel Dosimetry.

- a. The RPO will provide external and/or internal dosimetry (bioassay) to all USACE personnel who may exceed a Tier 2 radiation dose, and all personnel who enter a high or very high radiation area.
- b. The RPO will determine assignment of personnel dosimetry to other personnel. Any determination not to issue dosimetry to any individual who requests dosimetry will be discussed with the RPSO and the individual and documented.
- c. All personnel issued dosimetry will provide the RPO with a completed DD Form 1952 (Dosimeter Application and Record of Occupational Radiation Exposure) (example attached at Appendix C) and records, or points of contact, to determine the individual's previous dose history. The dose history will be recorded on the individual's exposure record, and reported to the US Army Ionizing Radiation Dosimetry Center (USAIRDC).
- d. External dosimetry will be provided to USACE personnel by the RPO, using dosimeters provided by USAIRDC. USAIRDC will also provide dosimetry reading and reporting services. USAIRDC maintains accreditation under the National Voluntary Laboratory Accreditation Program (NVLAP).
- e. Exposure of personnel to ionizing radiation shall be reported and recorded. Exposures shall be recorded using the computer printout generated by USAIRDC or NRC Form 5 (a copy for reference of the USAIRDC computer generated version of NRC Form 5 is provided at Appendix C). Exposures measured using other than USAIRDC dosimetry shall be reported to USAIRDC.

- f. Dosimetry results and dose history will be reported and explained by the RPO to all individuals:
 - (1) annually;
 - (2) upon termination from the dosimetry program; and,
- (3) within 30 days of the request of any individual presently or previously monitored under the dosimetry program.
- g. Employee exposure records will be maintained in accordance with the requirements in 10 CFR 19 and 20, 29 CFR 1910.1020 and 5 CFR Part 339.
- h. At the request of an employee who participated in a USACE dosimetry program, or that employee's designee, a report of the employee's dose history shall be furnished by the RPO through the Human Resources Management Office to the employee or his/her designee within 30 days of the request (in accordance with paragraph 11g above).
- i. The RPO will review all exposure records at least once in each three-month period to ensure that exposures are being kept ALARA.
- 12. Control of Exposure from External Sources in Restricted Areas. Authorized Users and the RPO will ensure that all entrances to High and Very High Radiation Areas are locked when access is not required, and that individuals document all required entries.

13. Storage and Control.

- a. Radioactive materials will be secured by the user to prevent unauthorized access or removal when not in use.
- b. Radioactive materials not in secure storage will be under the constant surveillance and control of the authorized user.
- c. The RPO shall physically inventory all radioactive materials and radiation generating devices within his or her Command every six months. The physical inventory will be performed more frequently if required by regulations, license or ARA conditions. The inventory will be documented and retained by the RPO.

- d. The RPO shall ensure that all radioactive sources are leak tested every six months, unless specifically exempted from testing, or if the testing frequency listed in NRC regulations, the NRC license or ARA conditions is different. Leak test results will be recorded on ENG Form 3309-R (Record of Radioactive Material (a copy is provided at Appendix C)) and filed with the appropriate license or ARA documentation at the Command.
- e. If leak test results exceed 0.005 microcurie the source will be removed from service and the RPO notified as soon as possible. The RPO will properly prepare the source for shipping and return the source to the manufacturer or dispose of the source according to regulations, and if necessary notify the NRC in accordance with 10 CFR 21.

14. Precautionary Procedures.

- a. The RPO will assure that all radiation areas, high radiation areas, and very high radiation areas are posted with the appropriate radiation area sign.
- b. The RPO will ensure that all radioactive materials or their containers, and all equipment containing a radioactive source bear a radioactive materials label and all rooms or areas where radioactive materials are used or stored are posted with the appropriate radioactive materials sign.
- c. The RPO will ensure that each package received containing radioactive materials is surveyed for radiation levels, that each labeled package, other than special form sources, and all damaged or degraded packages are wipe tested for external contamination. This will be performed within 3 hours of receipt of the package if the package is received during normal business hours, and within the first 3 business hours of the next business day if received after normal business hours.
- d. Should external radiation exceed 10 mrem at 1 meter from the package or if contamination levels exceed 200 dpm per $100 \, \mathrm{cm^2}$, the RPO will immediately notify the RPSO, the final delivery carrier and their NRC regional office, if applicable.
- 15. Transfer of USACE Radioactive Material and Radiation Generating Devices.

- a. The RPSO must approve any transfer of any radioactive material.
- b. The request for authorization to transfer radioactive materials will be submitted through channels to the RPSO on ENG Form 4790-R (Request for Authorization to Transfer Radioactive Materials, Appendix C).
- c. Proper shipping documents will be prepared according to Department of Transportation (DOT) regulations found in Title 49 CFR.
- d. For all NRC licensed materials, a Certificate of Disposition of Materials will be prepared in accordance with paragraph 17c of this regulation.
- 16. Transportation of Radioactive Materials. All radioactive materials will be transported in accordance with Title 49 CFR. Additionally, NRC licensed radioactive materials will be transported in accordance with 10 CFR 71.

17. Waste Disposal.

- a. All radioactive waste disposal shall be coordinated through the HTRW-CX. All DOD environmentally remediated low level radioactive waste (LLRW) disposal will be coordinated with the HTRW-CX and the DOD executing agent for low-level radioactive waste disposal (U.S. Army Industrial Operations Command (USAIOC), AMSIO-DMW, Rock Island, IL 61299-6000). Department of Defense (DOD) LLRW disposal not associated with environmental remediation actions shall be performed by the DOD LLRW executing agent.
- b. All releases of radioactive effluents will be in accordance with 10 CFR 20, and will be approved by the State and local regulatory agencies. A record of all effluent releases containing the date, radio nuclide, activity and chemical form will be maintained.
- c. An NRC Certificate of Disposition of Materials, NRC Form 314, (a copy is attached at Appendix C) will be prepared for all NRC licensed materials prior to disposal or transfer. The certificate will be forwarded through channels, to the RPSO who will review and forward it to the NRC.

18. Records.

- a. The RPO will maintain records of the provisions and implementation of their Command's radiation protection program and all audits and reviews of the program for the time required by any NRC regulation or license condition, ARA or as listed in AR 25-400-2, Modern Army Recordkeeping System.
- b. The RPO will maintain records of the monitoring and surveys required in paragraph 10 above, all instrument calibration records, all internal and external personnel dosimetry records, all waste disposal, all effluent release records, and all decommissioning records in accordance with applicable Federal and DA regulations. Employee exposure records, and decommissioning records will be maintained in accordance with 10 CFR 20 and 29 CFR 1910.1020. The RPO will maintain these records for the time required by any NRC regulation or license condition, ARA or as listed in AR 25-400-2. Employee training records will be maintained in accordance with Human Resources Management Office policies.

19. Reports.

- a. The RPO will immediately report the loss or theft of NRC licensed radioactive materials to the NRC within the time frames listed in 10 CFR 20. The RPO will notify the RPSO as soon as possible of any notification of the NRC of loss or theft of materials.
- b. The RPO will notify the RPSO of any exposure exceeding Tier 2 USACE Dose Limits and any release of radioactive materials that could potentially cause a dose to an individual to exceed the Tier 2 USACE Dose Limits, or an event that could lead to a member of the public receiving a significant portion of the 100 mR/yr dose limit. If appropriate, the RPO will notify the NRC of overexposures and releases as defined by NRC in a timely manner as per 10 CFR 20. The RPO will notify the RPSO as soon as possible of any notification of the NRC of overexposure or releases.

20. Nuclear Regulatory Commission Licenses.

a. All NRC license application, amendment, and termination requests, all enclosures, and correspondence will be forwarded, in triplicate through channels, to the RPSO 90 days prior to the

date the action is needed. The RPSO will review and forward these documents to the NRC.

- b. The NRC license will specify the time period for which the license is valid, and the license conditions will specify any special procedures applicable to the possession and use of the radioactive materials.
- c. Radioactive materials will not be procured until the required NRC licenses have been received.

21. Army Radiation Authorizations.

- a. All radioactive materials that are not licensed by NRC, and all radiation generating devices for possession or use by USACE personnel must be covered by an Army Radiation Authorization (ARA) issued by USACE. An ARA is required for all such sources except—
- (1) Byproduct, source, or special material which the NRC has declared to be license-exempt (10 CFR 30, sections 30.14 through 30.20; 10 CFR 40, sections 40.13 and 40.14; and 10 CFR 70, section 70.14) or generally licensed material (10 CFR 31; 10 CFR 40, sections 40.20 through 40.28; and 10 CFR 70, section 70.19).
- (2) Less than 0.1 microcurie (μCi) [3.7 kilobecquerels (kBq)] of radium.
- (3) Less than 1 μCi (37 kBq) of any naturally occurring or accelerator produced radioactive material (NARM) other than radium.
- (4) For electron tubes containing less than 10 μ Ci (370 kBq) of any NARM radioisotope.
- (5) For machine-produced ionizing radiation sources not capable of producing a high radiation area or very high radiation area. (For example, medical and dental diagnostic x-ray systems do not require an ARA.)
- (6) For Army nuclear reactors and Army reactor-produced radioactive material (RAM) that remains at the reactor site. The Army Reactor Office issues Army reactor permits for these sources per AR 50-7, The Army Reactor Program.

- b. All Army Radiation Authorization (ARA) applications, amendments, and termination requests, and correspondence will be forwarded, through channels, to the RPSO. The RPSO will review these documents, and when they are in compliance, issue on behalf of the Commanding General, USACE, the ARA and any required conditions.
- c. Application for an ARA, amendment to an ARA, or termination for an ARA including all enclosures, will be submitted through channels using DA Form 3337 (Appendix C), to the RPSO not later than 30 days prior to the date the action is needed.
- d. ARA conditions will specify the time period for which the ARA is valid, and any special procedures applicable to the possession and use of the radioactive materials or radiation generating devices.
- e. Many states require registration of radiation generating devices. The RPO will determine the need to register all radiation generating devices within their Command with state authorities, and, if required, follow the procedures of the registering agency as necessary.
- f. Radioactive materials and radiation generating devices will not be procured until the required ARAs have been received.
- 22. Army Radiation Permits. USACE contractors wishing to use, store, or possess radioactive materials or radiation generating devices on any DA installation, project or facility must obtain an Army Radiation Permit (ARP). For purposes of this paragraph, "ionizing radiation source" means any source that, if held or owned by an Army agency, would require a specific NRC license or ARA.
- a. The non-Army applicant will apply by letter with supporting documentation (paragraph 22.b, below) through the appropriate tenant Commander (if applicable) to the installation Commander.
- b. The ARP application will specify start and stop dates for the ARP and describe for what uses the applicant needs the ARP. The installation Commander will approve the application only if the applicant provides evidence to show that one of the following is true.

- (1) The applicant possesses a valid NRC license or Department of Energy (DOE) radiological work permit that allows the applicant to use the source as specified in the ARP application.
- (2) The applicant possesses a valid agreement State license that allows the applicant to use RAM as specified in the ARP application, and the applicant has filed NRC Form-241, Report of Proposed Activities in Non-Agreement States, with the NRC in accordance with 10 CFR 150.20. An ARP issued under these circumstances will be valid for no more than 180 days in any calendar year.
- (3) For NARM and machine-produced ionizing radiation sources, the applicant has an appropriate State authorization that allows the applicant to use the source as specified in the ARP application or has in place a radiation protection program that complies with Army regulations.
- (4) For overseas installations, the applicant has an appropriate host-nation authorization as necessary that allows the applicant to use the source as specified in the ARP application and has in place a radiation protection program that complies with Army regulations.
- c. All ARPs will require applicants to remove all permitted sources from Army property by the end of the permitted time.
- d. Disposal of radioactive material by non-Army agencies on Army property is prohibited. However, the installation Commander may authorize radioactive releases to the atmosphere or to the sanitary sewerage system that are in compliance with all applicable Federal, DOD, and Army regulations.

23. Air Force and Navy Radiation Permits.

- a. USACE personnel and USACE contractors wishing to use radioactive materials or radiation generating devices on any Air Force installation must obtain permission from the installation. On Air Force property, contact the installation Environmental Health Section for instructions.
- b. USACE personnel and USACE contractors wishing to use radioactive materials or radiation generating devices on any Navy installation must obtain permission from the installation. On

Navy property, contact the installation Safety Office for instructions.

24. EM 385-1-80 Radiation Protection Manual provides more indepth guidance and explanation of methods to meet the requirements of this regulation, and to provide a greater level of radiation protection (ionizing and non-ionizing) to USACE personnel, the public and the environment.

FOR THE COMMANDER:

3 Appendices

APP A - References

APP B - Definitions

APP C - Forms Required

OTIS WILLIAMS

Colonel, Corps of Engineers

Chief of Staff

Appendix A

References

- 10 Code of Federal Regulations (CFR) Energy: revised 21 May 1992.
- 29 CFR 1910 Labor
- 49 CFR 171-179: Transportation
- Public Law 96-573 National Low Level Radioactive Waste Policy Act of $\overline{1980}$ 42 U. S. C. 2021-2121D
- AR 25-400-2 Modern Army Recordkeeping System
- AR 40-14 Occupational Ionizing Radiation Personnel Dosimetry
- AR 40-5 Preventive Medicine
- AR 50-7 The Army Reactor Program
- AR 385-11 Radiation Protection
- ER 385-1-92 <u>Safety and Occupational Health Document</u> Requirements for Hazardous Waste Site Remedial Actions
- EM 385-1-1 Safety and Health Requirements Manual
- EM 385-1-80 Radiation Protection Manual

Appendix B

Definitions

ABSORBED DOSE - The amount of energy imparted to matter by ionizing radiation per unit mass of irradiated material. The unit of absorbed dose is the rad (or prefixed forms of the unit such as millirad); which is 100 ergs/gram. The SI unit for the rad is the gray. 1 gray = 100 rads.

ACTIVITY - The number of nuclear disintegrations occurring in a given quantity of material per unit time. (See Curie)

ANNUAL LIMIT OF INTAKE (ALI) - Means the derived limit for the amount of radioactive material taken into the body of an adult worker by inhalation or ingestion a year.

BACKGROUND RADIATION - Ionizing radiation arising from radioactive material other than the one directly under consideration. Background radiation due to cosmic rays and natural radioactivity is always present. There may also be background radiation due to the presence of radioactive substances in other parts of the building, in the building material itself, etc. Background radiation includes radiation from fallout, radioactive effluents from other sources, and medical radiation.

COMMITTED DOSE EQUIVALENT (CDE) – $(H_{T,50})$ Means the dose equivalent to organs or tissues of reference (T) that will be received from an intake of radioactive material by an individual during the 50 year period following the intake.

CONTAMINATION, RADIOACTIVE - Deposition of radioactive material in any place where it is not desired, and particularly in any place where the presence may be harmful.

CRITICAL ORGAN - That organ or tissue, the irradiation of which will result in the greatest hazard to the health of the individual or his or her descendants.

CURIE - The quantity of any radioactive material in which the number of disintegrations is 3.700×10^{10} per second. Abbreviated Ci.

Millicurie - One-thousandth of a curie (3.7×10^7) disintegrations per second). Abbreviated mCi.

Microcurie - One-millionth of a curie $(3.7 \times 10^4 \text{ disintegrations per second})$. Abbreviated μCi . Picocurie - One-millionth of a microcurie $(3.7 \times 10^{-2} \text{ disintegrations per second or } 2.22 \text{ disintegrations per minute})$. Abbreviated pCi.

DECLARED PREGNANT WORKER - Means a women who has voluntarily informed her employer, in writing, of her pregnancy and the estimated date of conception.

DEEP DOSE EQUIVALENT (DDE) - (H_d) Which applies to external whole-body exposure, is the dose equivalent at a tissue depth of 1 cm (1000 mg/cm²).

DERIVED AIR CONCENTRATIONS (DAC) - Means the concentration of a given radio nuclide in air which, if breathed by the reference man for a working year of 2,000 hours under conditions of light work (inhalation rate $1.2~\rm m^3/hr$), results in an intake of one ALI.

DOSE - A general term denoting the quantity of radiation or energy absorbed in a specified mass. For special purposes, it must be appropriately qualified (e.g., absorbed dose).

DOSE, ABSORBED - The energy imparted to matter by ionizing radiation per unit mass of irradiated material at the place of interest. The unit of absorbed dose is the rad; which is 100 ergs/gram.

DOSE, EQUIVALENT - A quantity used in radiation protection expressing all radiation on a common scale for calculating the effective absorbed dose. The unit of dose equivalent is the rem, which is numerically equal to the absorbed dose in rads multiplied by certain modifying factors such as the quality factor, the distribution factor, etc.

EFFECTIVE DOSE EQUIVALENT (EDE) - (H_E) Is the sum of the products of the dose equivalent to organ or tissue (H_T) and the weighting factors (W_T) applicable to each of the body organs or tissues that are irradiated.

EXPOSURE - A measure of the ionization produced in air by x or gamma radiation. It is the sum of the electrical charges on all ions of one sign produced in air when all electrons liberated by photons in volume element of air are completely stopped in air, divided by the mass of air in the volume element. The special unit of exposure is the roentgen.

EXTREMITY - Means hand, elbow, arm below the elbow, foot, knee, or leg below the knee.

EXTERNAL DOSIMETRY - The use of Thermoluminescent Dosimeters, Film Badges or other exposure measuring devices to determine the radiation dose a person receives from sources outside the body.

EYE DOSE EQUIVALENT (LDE) - Applies to the external exposure of the lens of the eye and is taken as the dose equivalent at a tissue depth of 0.3 centimeter (300 mg/cm^2) .

HIGH RADIATION AREA - Means an area accessible to individuals, in which radiation levels could result in an individual receiving a dose equivalent in excess of 0.1 rem (1 mSv) in 1 hour at 30 centimeters from the radiation source or from any surface that the radiation penetrates.

INTERNAL DOSIMETRY - Also called Bioassay The use of instruments to measure radiation coming from inside the body or the analysis of urine, or fecal samples to determine the radiation dose a person receives from radiation sources inside the body.

IONIZING RADIATION - Any electromagnetic or particulate radiation capable of producing ions, directly or indirectly, in its passage through matter.

MONITORING - Periodic or continuous determination of the amount of ionizing radiation or radioactive contamination present in an occupied region as a safety measure for purposes of health protection, for example; Area Monitoring: Routine monitoring of the level of radiation or of radioactive contamination of any particular area, building, room or equipment; or Personnel Monitoring: Monitoring any part of an individual, his or her breath, excretions, or any part of his or her clothing (See Radiological Survey).

OCCUPATIONAL DOSE - The radiation dose a person receives as a result of activities related to their employment, but excluding doses resulting from background and medical radiation.

PLANNED SPECIAL EXPOSURE (PSE) - Means an infrequent exposure to radiation, separate from and in addition to the annual NRC (Tier 1) dose limit.

RADIATION - (1) The emission and propagation of energy through space or through a material medium in the form of waves; for instance, the emission and propagation of electromagnetic waves, or of sound and elastic waves. (2) The energy propagated through a material medium as waves; for example, energy in the form of electromagnetic waves or of elastic waves. The term "radiation" or "radiant energy," when unqualified, usually refers to electromagnetic radiation. Such radiation commonly is classified according to frequency as Hertzian, infrared, visible (light), ultraviolet, x-ray, and gamma ray. (3) By extension, corpuscular emissions, such as alpha and beta radiation, or rays of mixed or unknown type, as cosmic radiation.

RADIATION AREA - Means an area, accessible to individuals, in which radiation levels could result in an individual receiving a dose equivalent in excess of 0.005 rem (0.05 mSv) in 1 hour at 30 centimeters.

RADIATION GENERATING DEVICE - Any device which generates ionizing radiation. Examples include x-ray machines, x-ray diffraction units, and neutron generators. Radiation from reactors, accelerators, gas chromatographs and x-ray fluorescence devices come from radioactive materials generated or enclosed in the items.

RADIATION PROTECTION COMMITTEE - A committee, required by some NRC licenses to review and approve activities involving radiation within their command. The committee consists of the Commander or his or her deputy (who chairs the committee), the Chief, Safety and Occupational Health Office, the RPO (acting as recorder), the senior medical officer of the Command, and representative Authorized Users.

RADIATION SURVEY - Evaluation of the radiation hazards incident to the production, use or existence of radioactive materials or other sources of radiation under a specific set of conditions. Such evaluation customarily includes a physical survey of the disposition of materials and equipment, measurements or estimates of the levels of radiation that may be involved, and a sufficient knowledge of processes using or affecting these materials to predict hazards resulting from expected or possible changes in materials or equipment.

RADIO NUCLIDE OR RADIOACTIVE MATERIAL - A nuclide with an unstable ratio of neutrons to protons placing the nucleus in a state of stress. In an attempts to reorganize to a more stable state, it may undergo various types of rearrangement that involve the release of radiation.

REM - The special unit of dose equivalent. The dose equivalent in rems is numerically equal to the absorbed dose in rads multiplied by the quality factor, distribution factor, and any other necessary modifying factors.

ROENTGEN (R) - The quantity of x or gamma radiation such that the associated corpuscular emission per 0.001293 grams of dry air produces, in air, ions carrying one electrostatic unit of quantity of electricity of either sign. The roentgen is the special unit of exposure. MILLIROENTGEN (mR) - A submultiple of the roentgen equal to one one-thousandth (1/1000th) of a roentgen.

SHALLOW DOSE EQUIVALENT (SDE) - (H_s) Which applies to the external exposure of the skin or an extremity, is taken as the dose equivalent at a tissue depth of 0.007 centimeters (7 mg/cm²) averaged over an area of 1 square centimeter. Shallow Dose Equivalent, Whole Body (WB) means for purposes of external exposure, head, trunk (including male gonads), arms above the elbow or legs above the knee. Shallow Dose Equivalent, Maximum Extremity (ME) means for purposes of external exposure, arms below the elbow or legs below the knee.

SIEVERT - The SI unit of dose equivalent, 1 sievert (Sv) equals 100 rem.

SIGNS - Radiation signs contain a magenta or black trefoil (radiation symbol) on a yellow background and contain the

wording: "Caution Radiation Area", "Caution High Radiation Area", "Grave Danger Very High Radiation Area", or "Caution Radioactive Materials" as appropriate.

TOTAL EFFECTIVE DOSE EQUIVALENT (TEDE) - Means the sum of the Deep Dose Equivalent (for external exposures) and the Committed Effective Dose Equivalent (for internal exposures).

THERMOLUMINESCENT DOSIMETER - A dosimeter made of certain crystalline material which is capable of both storing a fraction of absorbed ionizing radiation and releasing this energy in the form of visible photons when heated. The amount of light released can be used as a measure of radiation exposure to these crystals.

VERY HIGH RADIATION AREA - Means an area, accessible to individuals, in which radiation levels could result in an individual receiving an absorbed dose in excess of 500 rads (5 grays) in 1 hour at a meter from a radiation source or from any surface that the radiation penetrates.

WEIGHTING FACTORS (W_T) - For an organ or tissue (T) is the proportion or the risk of stochastic effect resulting from irradiation of that organ or tissue of the total risk of stochastic effect when the whole body is irradiated uniformly.

Appendix C

Required Forms

DD Form 1952

DA Form 3337

ENG Form 3309-R

ENG Form 4790-R

NRC Form 3 (For Reference only, not to full scale as required (17" by 11")

USAIRDC Computer Generated version of NRC Form 5

NRC Form 241

NRC Form 313

NRC Form 314

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DETACH INSTRUCTIONS SHEET BEFORE SUBMITTING APPLICATION

INSTRUCTIONS FOR PREPARING DA FORM 3337

GENERAL INSTRUCTIONS

An applicant for a DA Radiation Authorization or Permit should complete DA Form 3337 in detail. The completed form will be submitted through channels to Chief, Safety Office, DARCOM, ATTN: DRCSF-P, 5001 Eisenhower Avenue, Alexandria, VA 22333. Four signed and dated copies of the application are required.

Complete items 1 through 20c of DA Form 3337 if this is an initial application or a renewal application. Information for items 8 through 15 contained in previous applications filed with the Chief, Safety Office, DARCOM

may be included by reference provided references are clear and specific. Use supplemental sheets when necessary to provide complete information. Items 19 through 20c must be completed on all applications.

Ensure that applications are completed and detailed. Submitting an incomplete application will result in a delay in issuing the DA authorization or permit.

After the application *is* approved, the applicant will receive a DA authorization or permit according to the general requirements of AR 385-11.

SPECIFIC INSTRUCTIONS

Check appropriate box to indicate whether application is for a DA "Authorization" or "Permit."

ITEMS 1 AND 2 – The "Applicant" is the organization or person legally responsible for possession and use of the radiation source(s) listed in the application.

ITEM 3 - Indicate the address where the radiation source(s) will be used or stored if different from that listed in item 2. A Post Office box is *not* acceptable.

ITEM 4 – The "Department" is the department or similar subdivision that has field responsibility for the radiation source(s).

ITEM 5- Show whether numbers denote an NRC license or DA authorization or permit.

ITEM 6- The "Individual User" is the person who will be responsible for the use and safe handling of radiation source(s).

ITEM 7 - Include name of Army or Contractor RPO.

ITEM 8 – List by name each radioactive material needed, such as Ra- 226, etc. List electronic radiation devices by type and parameters, such as industrial x-ray, 150 KVP, 20 MA.

ITEM 9 - List chemical and/or physical form for each radioactive byproduct material. List the quantity in millicuries of each material the applicant needs to have authorized for use. If more than one chemical or physical form of a particular radioisotope is needed, a separate possession limit will be stated for each form. For example, an applicant needing two chemical forms of Radium-226 must list both forms and the possession limit for both.

EXAMPLE:

Ra-226	Ra Sulphate	10 millicuries
	(Sealed Source)	
Ra-226	Radium Chloride	1 millicurie

If the radioactive material is to be obtained as a sealed source(s), specify the amount of activity in each sealed source, the manufacturer's name, and the model number.

in Solution

EXAMPLE:

Ra-226 2 sealed sources, 25 mc each 50 millicuries (US Radium Corp., Model 3-124)

ITEM 10- State the use of each radioactive material and chemical form specified in items 8 and 9.

ITEMS 11 AND 12 – These items must be completed for each individual named in items 6 and 7. If more than one individual is listed in items 6 and 7, clearly key the name of each individual to his or her experience. Work experience or on-the-job training should be commensurate with proposed use.

ITEMS 13 THROUGH 16- Self-explanatory.

ITEM 17- Include procedures for property decontamination and restoration.

ITEM 18- Self-explanatory.

ITEMS 19 THROUGH 20c – Application must be signed by responsible Official, e.g., Commander or Corporate President.

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13.	RADIATION D	ETECTION INSTR	IUMENTS (FOR I Jee supplemental s	ISE BY RADIATI	ON PROTECTION)	PERSONNEL)
TYPE OF INST		NUMBER AVAILABLE	RADIATION DETECTED	SENSITIVITY RANGE (mr/hr)	WINDOW THICK NESS (mg/cm ²)	USE (Monitor - Survey - Measure)
			j.		i.	
						•
. METHOD, FREQU	ENCY, AND STANI	DARDS USED IN C	ALIBRATING IN	STRUMENTS LIS	TED ABOVE	
. FILM BADGES, DO	SIMETERS, AND B	IO-ASSAY PROCE	DURES USED (F	or film hadges sae	cify method of call	brating and processing, or name of
oplier.)		TO ASSAT FROCE	EDURES USED (F	or jun baages, spe	cily method of con	orating and processing, or name of
DESCRIBE PROJEC	CT, EXPERIMENT,	ETC. (Include majo	or facilities and eq	sipment to be used	•)	
RADIATION PROTE	ECTION PROGRAM	(Applicable to use	at the installation	(s) named in item	3)	
WASTE DISPOSAL	NOTE: No radioac	tive material may b	e ultimately dispos	sed of at Army inst	allations except as	provided in para 5-15, AR 385-11.)
			STATEME			
	 		,			
						CANT NAMED IN MENTS, IS CORRECT.
. DATE	206. TYPED N	IAME AND TITLE		11:	20c. SIGNATURE	
				i		
				i		

	KECOKD OF R	RADIOACTIVE MATERIAL	
THRU:	TO:	FROM:	
	DEVICE CONTAINING SOURCE	SOURCE	
AME (Source set, I	Density gauge, etc.)	ELEMENT/ISOTOPE	
		TYPE (Farm)	
MANUFACTURER		INITIAL ACTIVITY/DATED	···
		MANUFACTURER	
IODEL NO.			
ERIAL NO.		MODEL NO.	
NRC LICENSE NO.		SERIAL NO(S).	
ADIATION PROTE	ECTION OFFICER		
	CHRON	OLOGICAL RECORD	
DATE	ACTION OR EVENT RECORDED (Received from, leak tasted, used by, transferred to, disposed of, etc)	REMARKS (Report leak test results in microcuries)	INITIAL
IG FORM 3309-	R, February 1997 REPLACES ENG FO	ORM 3309-R, 1 JUL 80, WHICH MAY BE USED.	(Proponent:

REQUEST	FOR AUTHORIZAT	TION TO TRAN (ER 385-1-80)	SFER RADIOACT	IVE MATERIAL	DATE
THRU:	To:			FROM:	
		1. REQUESTO	R (USACE Command)	1	
NRC LICENSE, DA OR U	SACE AUTHORIZATION	NUMBER:	NAME AND ADDRE	SS:	
		2. ITEMS TO	BE TRANSFERRED		
	EQUIPMENT (Source Cor			SOURCE (Radioacti	
TYPE	MANUFACTURER	MODEL	SERIAL NUMBER	ELEMENT AND MASS. NO.	ACTIVITY
			ACE Command, Firm)		
NRC LICENSE, DA OR U	SACE AUTHORIZATION	NOMBER:	NAME AND ADDRE	ss:	
TITLE (Requesting RPO):			SIGNATURE:		DATE
4. HQUSACE APPROVA	AL: COM	MMENTS:			
ENG FORM 4790-R, Fe	abruary 1997	EDITION C	DF MAY 82 IS OBSOL	ETE. `	(Proponent: CESO

UNITED STATES NUCLEAR REGULATORY COMMISSION Washington, DC 20555-0001

NOTICE TO EMPLOYEES

STANDARDS FOR PROTECTION AGAINST RADIATION (PART 20); NOTICES, INSTRUCTIONS AND REPORTS TO WORKERS; INSPECTIONS (PART 19), EMPLOYEE PROTECTION



WHAT IS THE NUCLEAR REGULATORY COMMISSION?

The Nuclear Regulatory Commission is an independent Federal regulatory agency responsible for licenting and inspecting nuclear power plants and other commercial uses of redioactive meterials.

WHAT DOES THE NRC DOT

The NRC's primary responsibility is to ensure that workers and the public are protected from unnecessary or accessive exposure to radiation and that nuclear facilities, including power plants, are constructed to high quality standards and operated in a sale manner. The NRC does this by sitabilishing requirements in little 10 of the Code of Federal Regulations (10 CFR) and in Microses issued to nuclear users.

WHAT RESPONSIBILITY DOES MY EMPLOYER HAVE?

Any company that conducts activities licensed by the NRC must comply with the NRC's requirements. If a company violates NRC requirements, it can be fined or have its license modified, suspended or revoked.

Your employer must tell you which NRC radiation requirements apply to your work and must post NRC Notices of Motation involving radiological working conditions

WHAT IS MY RESPONSIBILITY?

for your own protection and the protection of your co-workers, you should know him? I requirements relate to your work and should obey them. If you observe violations of the requirements or have a safety concern, you snould report them.

WHAT IF I CAUSE A VIOLATION?

If you engaged in deliberate misconduct that may cause a violation of the NAC regularments, or would have caused a violation if it had not been desected, or deliberately provided inaccurate or incomplete information to what the NAC or to your employer, you may be subject to enforcement action. If you report such a violation, the NAC will consider the discountainess surrounding your reporting in determining the appropriate enforcement action. If you enforcement action, if any

HOW DO I REPORT VIOLATIONS AND SAFETY CONCERNS?

If you believe that violations of NAC tules or the terms of the license have a you users that violations of reflections of the series of the scenes have occurred, or it you have a safety concern, you should seport their immediately to your supervisor. You may report violations or ealisty concerns directly to the NRC. However, the NRC encourages you to raise your concerns with the licensee since it is the licensee who has the primary responsibility for, and is most able to ensure, sele operation of nuclear lacklities. If you choose to report your concern discriby to the NRC, you may report this to an NRC inspector or call or write to the NRC Negocial Citics. report may be an info. Suspection or call or writes to the rare. Prognost Office serving your area. If you send your concern in writing, it will assist the NRC in protecting your identity if you clearly state in the beginning of your testur-thal you have a safety concern or that you are submitting an allegation. The NRC stoll like SN ETY HOUR ME for reporting safety concerns it listed below. The addresses but the NRC Regional Utilizes and the toll fine. telephone numbers are also listed below

WHAT IF I WORK WITH RADIOACTIVE MATERIAL OR IN THE VICINITY OF

If you work with radioactive materials or near a radiation source, the amount of radiation exposure that you are parentited to receive may be limited by WHC requisitions. The limits on your exposure are contained in section 20 (20), 20 (20), and 20 (200 of fittle 10 of the Code of Federal Regulations (III CFF) 20) depending on the part of the regulations to which your employer to subject. While these are the maximum allowable limits, your employer should also keep your radiation exposure as far below those finites as 'reasonably achievable."

MAY LIGHT A RECORD OF MY RADIATION EXPOSURE?

Yes. Your employer is required to advise you of your dose annusty if you are exposed to radiation for which monitoring was required by NRC. In addition, you may request a written report of your exposure when you leave

HOW ARE VIOLATIONS OF NRC REQUIREMENTS IDENTIFIED?

NRC conducts regular inspections at licensed facilities to assure compliance with NRC requirements. In addition, your employer and afte confractors conduct their own hispections to assure compliance. All inspectors are protected by Federal law interference with them may result in criminal prosecution for a Federal otherse.

MAY LITALK WITH AN NING INSPECTORY

Yes NRC Inspectors want to talk to you if you are worried about radiation safety or have other sefety concerns about Richard activities, such as the quality of construction or operations at your facility. Your enployer may not prevent you from talking with an Inspector. The NRC will insee at reasonable afforms to protect your teaming where appropriate and possible

MAY LIBERLIEST AN INSPECTION?

Yes. If you believe that your employer has not corrected violations involving radiological working conditions, you may request an inspection.

Your request should be addressed to the nearest NRC Regional Office and must describe the sileged violation in detail. It must be signed by you or your representative

HOW DO I CONTACT THE NRC?

Talk to an NRC inspector on-site or call or write to the nearest NRC Tak to an rink. Impactor on the or tak or write to the reason and the special of the special of

CAN I BE FIRED FOR RAISING A SAFETY CONCERN?

Federal law prohibits an employer from firing or otherwise discriminating against you for bringing salesty concerns to the attention of your amployed of the NRC. You may not be lired or discriminated against because you

- . ask the NRC to enforce its rules against your employer;
- · refuse to engage in activities which violate NAC requirements;
- · provide information or are about to provide information to the NRC or your employer about violations of requirements or safety concerns;
- are about to ask for, or testify, help, or take part in an NRC, Congressional, or any Federal or State proceeding

WHAT FORMS OF DISCRIMINATION ARE PROHIBITED?

it is unlawful for an amployer to fire you or discrimente against you with respect to pay, benefits, or working conditions because you help the NPC or take a salely listue or otherwise obscourage you som angeging in protected activities. Motalouse of Saction 21 of the Energy Reorganization Act (ERA) of 1974 (421 S.C. 585) Include the harasament and lydmidation by employers of 4) employees who bring seley concerns discotly to their anipoyers or to the NPC. All employees who have ratured to engage in an unlawful practice, provided that the employee has telendified the legality to the employee; (81) employees who have ratured to engage in an unlawful practice, provided that the employee has elementally all the behalfs. Congress or it any Federal or State proceeding agongland proposition for proposed provision) of the ERA or the Northic Energy Act (AEA) (1954; §9) employees who have commenced or caused to be commenced a proceeding for the administration or enforcement of engulement imposed under the ERA or AEA or who have, or are about to teathy, assist, or participate in such a proceeding. It is unlawful for an employer to fire you or discriminate against you with

HOW DO I FILE A DISCRIMINATION COMPLAINT?

If you believe that you have been discriminated against for bringing violations or satery concerns to the NRC or your employer, you may all a

complaint with the U.S. Department of Labor (DOL) pursuant to Section 211 compliant with the U.S. Department of Loop (IAA) pursuant to Section 211 of the EPA. Your compliant in unit describe the hilling of discumination and must be filled within 180 days of the occurrence. Filling an allegation, complaint, or request for action with the NRC does not estand the requirement to bits a complaint with the DOL within 180 days. You must like the complaint with the DOL. The HRC cannot like the complaint for you

Send complaints to

Office of the Administrator Wage and Hour Division, Room \$3502 Employment Standards Administration U.S. Department of Labor Constitution Avenue, NW Washington, DC 20210

or any local office of the DOL. Wage and Hour Division. Check your telephone directory under U.S. Government listings.

WHAT CAN THE DEPARTMENT OF LABOR DO?

If your complaint involves a violation of Section 211 of the ERA by your employer, if is the DOL, NOT THE TIRC, that provides the process for obtaining a personal remedy. The DOL will notify your employer that a complaint

If the DOL linds that your employer has unlawfully discriminated against you, it may order that you be reinstated, receive back pay, or be compensated for any injury surfered as a result of the discrimination.

The NRC will evaluate each altegation of harasament, intimidation, or discimination. Following this evaluation, an investigation from the HRC's Office of investigations may historiew you and review evaluable documentation. Based on the evaluation, and if applicable, the interview, the NRC will assign a priority and a decision will be made whether to pursue the matter hurther through an investigation. The assigned priority is based on the specifica of the case and its alignificance relative to other ongoing investigations. The HRC may not pursue an investigation to the opposit that a conditional on the matter whether the harasament, infinitiation, or discitrification actually occurred. Even if HRC decides not to pursue an investigation, if you have stilled a complaint with ECCL, the HRC will monitor the results of the DOL Investigation.

If the HRC or DOt, finds that unlawful discrimination has occurred, the HRC may leave a Notice of Violation to your employer, impose a fine, or auspend, moulty, or sevole your employer a HRC decrise

UNITED STATES NUCLEAR REGULATORY COMMISSION REGIONAL OFFICE LOCATIONS A representative of the Nuclear Regulatory Commission can be contacted by employees who wish to register complaints or concerns about radiological working conditions or other matters regarding compliance with Commission rules and regulations at the following addresses and telephone numbers.

Callaway Plant Site in Missouri and Grand Gulf Plant Site in Mississippi are under the purview of Region IV.

TELEPHONE REGION ADDRESS U.S. Nuclear Regulatory Commission, Region I 475 Allendale Road (800) 432-1156 King of Prussa, PA 19406-1415 U.S. Huclear Regulatory Commission, Region & 101 Mariatta Suiest, N.W., Suite 2900 н (800) 577 8510 Atlanta GA 30323 0199 U.S. Nuclear Regulatory Commission, Region M. 801 Warrenville Road ш (800) 522 3025 lisle, IL 60532 4351 U.S. Nuclear Regulatory Commission, Region N 611 Ryan Plaza Drive, Suite 400 ١V (800) 952 9677 Wington 1X 76011 8064 U.S. Hucker Regulatory Commission WALHUT CAEEK 1450 Maria Lane Walnut Craek, CA 94596 5368 (800) 882 4672

REGIONAL OFFICES

To report salety concerns or NRC requirements by your employer

telephone

SAFETY HOTLINE

1-800 695-7403

To report incidents involving fraud, waste, or abuse by an HRC employee or HRC consactor,

OFFICE OF THE INSPECTOR GENERAL

HOTLINE

1-800-233-3497

NRC FORM 5 (6-92) 10 CFR 20	U. S. NUCLEAR REGULATORY COMHISSION	Y ONB NO. 3'50-000E IRES:
DOS ACCOUNT CODE - PJ	EXPOSURE RE	ESTINATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST. HINDIES. FOR-WARD COMMENTS REGARDING BURDEN ESTINATE TO THE INFORMATION AND RECORDS HANAGENENT BRANCH (NNBB 7714). U.S. NUCLEAR REQUEATORY COUNTY NASHINGTON DC 20555, AND TO PAPERWORK REDUCTION FROJECT (3150-0006), OFFICE OF MANAGENENT AND BUDGET, WASHINGTON, DC 20503.
NAMETLAST, FIRST,	R. IDENTIFI	TYPE 4. SEX 5. DATE OF BIRTH
6. HONITORING PERIOD 01/22/95-02/26/96	NON-LICENSED SOURCE OF RADIATION B. LICENSE DOS ACCOUNT CODE - P.J.	NUMBER(S) ESTIMATE TSE
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		TAL BROAN DOSE EQUIVALENT,
	-	COMMENTS
20. SIGNATURE L CENSEE	11111111111111111111111111111111111111	21. DATE PREPARED

(Please read the instructions on	I. S. NUCLEAR REGULATORY COMMIS ROPOSED ACTIVITIES REEMENT STATES In the cover sheet before completing this form reposing to conduct the activities described below)	m.)	Estimate request the conduct unless to LLCS.	/ED BY OMB: NC. 3150-0013 dd burden per response to c 16 minutes. This nonfaction index to ensure that they are not the public health and sain normation and Records Mana- sion. Washington, CC 2055 131), Office of Management ar of sponsor, and a person is no displays a currently valid OMB . TYPE OF REPORT TIAL EVISION ARIFICATION INSEE CONTACT.	omaly with this mandati is required so that NRC in conducted in accordance. To conducted in accordance in Forward comments it general the Forward comments in the Pabol Budget Washington. Do trequired to respond to compol number. 3. CONTROL NL (Leave Blank assigned by FACSIMILE NUM	ray schedule inspection of ce with resulterments for egarding burden estimate U.S. Nuclear Regulatory environment Reduction Project IC 20503. NRC may not a collection of information IMBER. — Number to be NRC)
8 ACTIVITIES TO BE	CONDUCTED IN NON-AGREEMENT STA	ATESI			(Include Area Co	,
	LEAK TESTING AND/OR CALIBRATIONS	1123		LETHERAPY/IRRADIATO		.FR 130,20
PORTABLE GAUGES	OTHER (Specify)					
RADIOGRAPHY ⇒ TRAN	SPORTATION OA PROGRAM APPROVAL NO. & REV	V NO.	REGIST	ERED AS USER OF PACKAGE	NGS (CERTIFICATES OF	COMPLIANCE NOS.)
9. CLIENT NAME, ADDRESS, CITY/COUN		con	mpiete an	ATION ADDRESS (Street and address of directions as poss.	ole.)	
11. CLIENT TELEPHONE NUMBER (Include Area Code)	12. WORK LECATION TECHNICIAN AUTHORIZE			WCRK	13. WORK LOCATION T (Include Aree Code)	ELEPHONE NUMBER
14. DAT	ES SCHEDULED	15. NO	JMBER OF CDAYS	16. LOCA	TON REFERENCE N	UMBER
FROM .				LEAVE BLANK FOR INITIAL NUMBER TO BE ASSIGNED	SY NRC	313
	RK SITES ON SEPARATE SHEET TO IN					6 ABOVE.
18. AGREEMENT STATE SPECIFIC LICES	A WILL BE POSSESSED, USED, INSTALLED, SERVI of national seeled sources, or devices to USE WHICH AUTHORIZES THE UNDERSIGNED TO Coopies of the specific license must accompany the mid	be used.,	T ACTIVIT	TES WHICH ARE THE SAME		OF USE. AS
JCENSE NUMBER	STATE	EXPIRA	NTON OA	NE	TOTAL USAGE DAYS TO	DOATE
	19. CERTIFICATION (MUST E	I BE COL	MP! ET	ED BY APPLICANT		
19. CERTIFICATION (MUST BE COMPLETED BY APPLICANT) 1. THE UNDERSIGNED, HEREBY CERTIFY THAT: a. All information in this report is true and complete. b. I have read and understand the provision of the general license 10 CFR 150.20 reprinted in the cover sheet of this form set; and I understand that I am required to comply with these provisions as to all byproduct, source, or special nuclear material which I possess and use in non-Agreement States or offshore waters under the general license for which this report is filled with the U.S. Nuclear Regulatory Commission. c. I understand that activities, including storage, conducted in non-Agreements States under general license 10 CFR 150.20 are limited to a total of 180 days in calendar year. d. I understand that I may be inspected by NRC at the above listed work site locations and at the Licensee home office address for activities performed in non-Agreement States or offshore waters. I am also aware that I will be responsible for any fees associated with such inspections. e. I understand that conduct of any activities not described above, including conduct of activities on dates or locations different from those described above or without NRC authorization, may subject me to enforcement action, including conduct of activities on dates or locations different from those described above or commission.						
SUBMISSIONS TO THE NRC BE	S IN THIS CERTIFICATE MAY BE SUBJECT COMPLETE AND ACCURATE IN ALL MATER EMENT OR REPRESENTATION TO ANY DEF	IAL RE	SPECTS	5. 18 U.S.C. SECTION 1	001 MAKES IT A CRII	MINAL OFFENSE TO
	FICIAL (Typed/Finited Name and Title)	SIGNA	TURE			DATE
VRC FORM 241 (6-96)						

NRC FORM 313

U. S. NUCLEAR REGULATORY COMMISSION

APPROVED BY OMB: NO. 3150-0120

EXPIRES: 7/31/95

7-96) 10 CFR 30, 32, 33 14, 35, 36, 39 and 40

APPLICATION FOR MATERIAL LICENSE

Estimated burden per response to comply with this information collection request; 7 hours, Submittal of the application is necessary to determine that the applicant is qualified and that adequate procedures exist to protect the public health and safety. Forward comments regarding burden estimate to the information and Records Management Branch (T-8 F33), U.S. Nucleal Regulatory Commission, Washington, DC 20555-0001, and to the Paperwork Reduction Project (3150-0120), Office of Management and Budget Washington, DC 20503. NRC may not conduct or sponsor, and a person it not required to respond to, a collection of information unless it displays a currently valid OMB control number.

			ENSE APPLICATION					MPLETING APPLICATION.
APPLICATION FOR DIS	TRIBUTION OF E	KEMPT PRODUCTS F	ILE APPLICATIONS WITH	ŧ:	F YOU AR	E LOCATED IN:		
OFFICE OF NUCLEAR MATERIALS SAFETY AND SAFEGUARDS U.S. NUCLEAR REGULATORY COMMISSION WASHINGTON, DC. 2055-0001 ALL OTHER PERSONS FILE APPLICATIONS AS FOLLOWS: IF YOU ARE LOCATED IN: CONNECTICUT, DELAWARE, DISTRICT OF COLUMBIA, MAINE, MARYLAND, MASSACHUSETTS, NEW HAMPSHIRE, NEW JERSEY, NEW YORK, PENNSYLVANIA, RHODE ISLAND, OR VERMONT, SEND APPLICATIONS TO: UCENSING ASSISTANT SECTION NUCLEAR MATERIALS SAFETY BRANCH U.S. NUCLEAR REGULATORY COMMISSION, REGION I 475 ALLENDALE ROAD MATERIALS UCE U.S. NUCLEAR REGULATORY COMMISSION, REGION I 511 RYAN PLAZA SEND APPLICATION MATERIALS LICE U.S. NUCLEAR REGULATORY COMMISSION, REGION I 512 RYAN PLAZA SEND APPLICATION MATERIALS LICE U.S. NUCLEAR REGULATORY NUCLEAR REGULATORY COMMISSION, REGION I 513 RYAN PLAZA SEND APPLICATION MATERIALS LICE U.S. NUCLEAR REGULATORY NUCLEAR REGULATORY COMMISSION, REGION I 514 RYAN PLAZA SEND APPLICATION MATERIALS LICE U.S. NUCLEAR REGULATORY NUCLEAR REGULATORY U.S. NUCLEAR REGULATORY COMMISSION REGION II 117 RYAN PLAZA SEND APPLICATION MATERIALS LICE U.S. NUCLEAR REGULATORY NUCLEAR REGULATORY U.S. NUCLEAR REGULATORY NUCLEAR REGULATORY U.S. NUCLEAR REGULATORY NUCLEAR REGULATORY U.S. NUCLEAR REGULATORY MATERIALS LICE U.S. NUCLEAR REGULATORY NUCLEAR REGULATORY U.S. NUCLEAR REGULATORY NUCLEAR REGULATORY U.S. NUCLEAR REGULATORY NUCLEAR REGULATORY U.S. NUCLEAR						INDIANA, IOWA, MIK PLICATIONS TO: IJALS LICENSING SE IJALS LICENSING SE IJALS REGULATO RREPWILLE RO. IL 60532-4351 ARIZONA, ARKANSI A, MONTANA, NEBR NA, OREGON, PACIF TON, OR WYOMING AR MATERIALS LICE	ECTION RY COMMISSION, REGION AS. CALIFORNIA, COLORI RASKA, NEVADA, NEW ME FIG. TRUST TERRITORIES, I, SEND APPLICATIONS TO EDISING SECTION RIY COMMISSION, REGION RUTE 400	ADO, HAWAII, IDAHO, KANSAS, EXICO, NORTH DAKOTA, SOUTH DAKOTA, TEXAS, UTAH, C:
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A NEW U	CENSE							
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							TELEPHONE NUMBE	R
SUBMIT ITEMS 5 THRO	OUGH 11 ON 8-1/2	X 11" PAPER THE T	YPE AND SCOPE OF INF	ORMATIC	N TO BE P	ROVIDED IS DESCR	OBED IN THE LICENSE AP	PUCATION GUIDE.
			form; and c. meternum a	mount	8. PUR	POSE(S) FOR WHIC	CH LICENSED MATERIAL \	WILL BE USED.
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9. FACILITIES AND	EQUIPMENT.				10. RAC	NATION SAFETY PR	OGRAM.	
11. WASTE MANAGE	EMENT.					ENSEE FEES (See)	10 CFR 170 and Section 17	D.31) AMOUNT ENCLOSED S
		ed by applicant) THE	APPLICANT UNDERSTAN	IDS THAT			ESENTATIONS MADE IN T	
13. CERTIFICATION. (Must be completed by applicant) THE APPLICANT UNIDERSTANDS THAT ALL STATEMENTS AND REPRESENTATIONS MADE IN THIS APPLICATION ARE BINDING UPON THE APPLICANT. THE APPLICANT AND ANY OFFICIAL EXECUTING THIS CERTIFICATION ON BEHALF OF THE APPLICANT, NAMED IN ITEM 2. CERTIFY THAT THIS APPLICATION IS PREPARED IN COMPORMITY WITH TITLE 10, CODE OF FEDERAL REGULATIONS, PARTS 30, 32, 34, 35, 36, 39 AND 40, AND THAT ALL INFORMATION CONTAINED HEREIN IS TRUE AND CORRECT TO THE BEST OF THEIR KNOWLEDGE AND BELIEF. WARNING: 18 U.S.C. SECTION 1001 ACT OF JUNE 2, 1948 62 STAT. 749 MAKES IT A CRIMINAL OFFENSE TO MAKE A WILLFULLY FALSE STATEMENT OR REPRESENTATION TO ANY DEPARTMENT OR AGENCY OF THE UNITED STATES AS TO ANY MATTER WITHIN ITS JURISDICTION.								
CERTIFYING OFFICER	- TYPED/PRINTE	D NAME AND TITLE			SIGNATU	IRE		DATE
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TYPE OF FEE F	EE LOG	FEE CATEGORY	AMOUNT RECEIVED		NUMBER	COMMENTS		
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APPROVED BY				DATE				

NRC FORM 313 (7-96)

PRINTED ON RECYCLED PAPER

IRC FORM 314 U.S. NUCLEAR REGUL	ATORY COMMISSION	APPROVED BY C	MB: NO. 3150-0028	EXPIRES: 06/30/98
6-95)				
0 CFR 30.36(c)(1)(iv) 0 CFR 40.42(c)(1)(iv)		ESTRIMATED BURDEN PER REGULEST: 10 MINORES	RESPONSE TO COMPLY WITH	THIS MANDATORY INFORMATION COLLECTION BY MRC AS PART OF THE BASIS FOR ITS
0 CFR 70.38(c)(1)(iv)		DETERMINATION THAT	RABLO MEDB ZAK YTLUDAR DHI	NED OF RADIOACTIVE MATERIAL BEFORE THE
CERTIFICATE OF DISPOSITION OF	MATERIALS	TO THE INFORMATION A	or ummestructed use, forwar No recoros management br	NO COMMENTS REGARDING BURDON ESTIMATE ANCH (T-6 F33), U.S. NUCLEAR RESULATORY
CENTIFICATE OF DISPOSITION OF	IVIA I ENIALS	COMMESSION, WASHING	TON, DC 20555-0001, AMD 1	TO THE PAPERWORK REDUCTION PROJECT
INSTRUCTIONS: ALL ITEMS MUST BE COMPLETED	PRINT OR TYPE	CONDUCT OR SPONSOR	MANAGEMENT AND BUUGET, WA AND A PERSON IS NOT REQ	ISHINGTON, DC 20503. AN AGENCY MAY NOT DURKED TO RESPOND TO, A COLLECTION OF
SEND THE COMPLETED CERTIFICATE TO THE NRC OFFICE SPE		INFORMATION UNLESS IT	DISPLAYS A CURRENTLY VALID O	IMB CONTROL HUMBER
ICENSEE NAME AND ADDRESS			LICENSE NUMBER	
		1	Corner typication on	
			LICENSE EXPIRATION DA	15
A. MATERIALS I	DATA (Check one and	complete as nec	essarvi	
THE LICENSEE OR ANY INDIVIDUAL EXECU				RTIFIES THAT:
(Check and/o	r complete the appropri	ate item(s) belov	w.J	
1. NO MATERIALS HAVE EVER BEEN PROCURED O	R POSSESSED BY THE	LICENSEE UNDI	ER THIS LICENSE.	
OR OR	-			
2. ALL ACTIVITIES AUTHORIZED BY THE LICENSE	HAVE CEASED AND AL	L MATERIALS F	PROCURED AND/OF	R POSSESSED BY THE
LICENSE NUMBER CITED ABOVE HAVE BEEN DIS				
reverse side or provide attachments.)				
Describe specific material transfer actions and, if				
actions including the disposition of low-level radio applicable.	active waste, mixed wa	iste, Greater-tha	n-Class-C waste, a	nd sealed sources, if
арупсавте.				
For transfers, specify the date of the transfer, the	name of the license red	sipient, and the	recipient's NRC lice	nse number or Agreement
State name and license number.				
If materials were disposed of directly by the licens			ensee, licensed dis	posal site or waste
contractor, describe the specific disposal procedu	res (e.g., decay in stora	ge)		
	B. OTHER DATA			
1. OUR LICENSE HAS NOT YET EXPIRED; PLEASE T	ERMINATE IT.			
2. A RADIATION SURVEY WAS CONDUCTED BY THE			-	
AND TO DETERMINE WHETHER ANY CONTAMIN	IATION REMAINS ON T	HE PREMISES C	OVERED BY THE L	ICENSE. (Check one)
NO (Attach explanation)				
YES, THE RESULTS (Check one)				
ARE ATTACHED, or				1
WERE FORWARDED TO NRC ON (Date)				
3. THE PERSON TO BE CONTACTED	NAME			TELEPHONE NUMBER
REGARDING THE INFORMATION				(Include Ares Code)
PROVIDED ON THIS FORM				
4. MAIL ALL FUTURE CORRESPONDENCE REGARDING TH	IS LICENSE TO			
	CERTIFYING OFFICI	AL		
I CERTIFY UNDER PENALTY OF			TRUE AND CORREC	т
RINTED NAME AND TITLE	SIGNATURE			DATE
WARNING: FALSE STATEMENTS IN THIS CERT	FICATE MAY BE SU	BUECT TO CIV	/IL AND/OR CRIM	MINAL PENALTIES. NRC
REGULATIONS REQUIRE THAT SUBMISSIONS TO TH				
SECTION 1001 MAKES IT A CRIMINAL OFFENSE	TO MAKE A WILLFU	LLY FALSE ST	ATEMENT OR RE	
DEPARTMENT OR AGENCY OF THE UNITED STATES A	S TO ANY MATTER W	THIN ITS JURIS	SDICTIONS.	

FILE CERTIFICATES AS FOLLOWS:

IF YOU ARE A DISTRIBUTOR OF EXEMPT PRODUCTS, SEND TO:

DIVISION OF INDUSTRIAL AND MEDICAL NUCLEAR SAFETY OFFICE OF NUCLEAR MATERIAL SAFETY AND SAFEGUARDS U.S. NUCLEAR REGULATORY COMMISSION WASHINGTON, DC 20555-0001

ALL OTHERS, IF YOU ARE LOCATED IN:

CONNECTICUT, DELAWARE, DISTRICT OF COLUMBIA, MAINE, MARYLAND, MASSACHUSETTS, NEW HAMPSHIRE, NEW JERSEY, NEW YORK, PENNSYLVANIA, RHODE ISLAND, OR VERMONT, SEND APPLICATIONS TO:

LICENSING ASSISTANCE SECTION NUCLEAR MATERIALS SAFETY BRANCH U.S. NUCLEAR REGULATORY COMMISSION, REGION I 475 ALLENDALE ROAD KING OF PRUSSIA, PA 19406-1415

ALABAMA, FLORIDA, GEORGIA, KENTUCKY, MISSISSIPPI, NORTH CAROLINA, PUERTO RICO, SOUTH CAROLINA, TENNESSEE, VIRGINIA, VIRGIN ISLANDS, OR WEST VIRGINIA, SEND APPLICATIONS TO:

NUCLEAR MATERIALS SAFETY SECTION U.S. NUCLEAR REGULATORY COMMISSION, REGION II 101 MARIETTA STREET NW. SUITE 2900 ATLANTA, GA 30323-0199

IF YOU ARE LOCATED IN:

ILLINOIS, INDIANA, IOWA, MICHIGAN, MINNESOTA, MISSOURI, OHIO, OR WISCONSIN, SEND APPLICATIONS TO:

MATERIALS LICENSING SECTION
U.S. NUCLEAR REGULATORY COMMISSION, REGION III
801 WARRENVILLE ROAD
LISLE, IL 80532-4351

ALASKA, ARIZONA, ARKANSAS, CALIFORNIA, COLORADO, HAWAII, IDAHO, KANSAS, LOUISIANA, MONTANA, NEBRASKA, NEVADA, NEW MEXICO. NORTH DAKOTA, OKLAHOMA, OREGON, PACIFIC TRUST TERRITORIES, SOUTH DAKOTA, TEXAS, UTAH, WASHINGTON, OR WYOMING, SEND APPLICATIONS TO:

MATERIAL RADIATION PROTECTION SECTION
U.S. NUCLEAR REGULATORY COMMISSION, REGION IV
611 RYAN PLAZA DRIVE, SUITE 400
ARLINGTON, TX 76011-8064