



Rocky Mountain
Remediation Services, L.L.C.
... protecting the environment

COPY # 35

DIRECTIVE

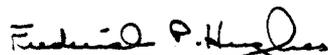
ALARA COMMITTEE CHARTER

OPS-DIR-008

Revision 0

Date Effective: 09/15/97

APPROVED:



8/25/97

Sr. Vice President, Operations

Page 1 of 4

1. PURPOSE

The purpose of this directive is to implement the RMRS ALARA Committee and to define its scope and responsibilities. All RMRS Operations will evaluate their activities against the RMRS ALARA screening criteria to identify those activities that will utilize this activity.

2. SCOPE

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

Rocky Mountain Remediation Services, L.L.C. (RMRS) conducts all operations involving ionizing radiation in a manner to ensure that exposure to personnel is "as low as reasonably achievable (ALARA)". This ALARA policy means that in addition to keeping radiation doses below regulatory limits, RMRS will strive to keep radiation doses (internal and external) received from normal operations and from accidents, as low as reasonably achievable to employees, the public, and the environment. This policy is integral in completing our programmatic requirements within the budget, schedule, and safety requirements. The ALARA policy is achieved by integrating the following components: management commitment, funding, and involvement; project engineering and planning; the training of workers and management in the ALARA practices of "time, distance, and shielding"; the Radiation Work Permit (RWP) Program; and the site's radiological procedures and practices.

DOCUMENT CLASSIFICATION
REVIEW WAIVER PER
CLASSIFICATION OFFICE

ADMIN RECORD

A SW-A-002481

3. DIRECTION

A. The ALARA Program

The following are essential elements that constitute an acceptable occupational ALARA program and RMRS Management shall ensure these are incorporated into each activity:

- **Management Commitment:** Establish commitment and participation of all line management and all levels of the work force to the ALARA policy;
- **Assignment of Responsibilities:** Assign specific responsibilities to line management and workers involved in implementing the ALARA program;
- **Administrative Control Levels:** Establish a challenging level of administrative control which is more restrictive than the RFETS Site goal of 750 mrem per year;
- **Radiological Performance Goals:** Establish, approve, and review, at least annually, a program of radiological performance goals;
- **ALARA Training:** Require the attendance of managers and workers involved with any aspect of radiological operations;
- **Plans and Procedures:** Set up formal plans and measures for applying the ALARA process to occupational exposures for projects above triggering levels;
- **Internal Audits/Assessments:** Conduct comprehensive internal reviews, audits, and evaluations periodically and report the results to the highest levels of RMRS management;
- **Optimization Methodology:** Use methods of optimization to set criteria for decisions on identification and implementation of ALARA efforts;
- **Radiological Design Review:** Ensure the integration of appropriate methods and considerations during the design phase to maintain occupational exposures ALARA during subsequent construction, modification, and operation of the equipment or facility;
- **Radiological Work/Experiment Planning:** Implement controls and use methods of optimization to assure that occupational exposure is maintained ALARA for routine and special operations or experiments; and
- **Records:** Maintain documents that demonstrate compliance and that the program is adequately carried out

Program Elements:

RMRS will ensure that radiation exposures to its workers and the public and the releases of radioactivity to the environment are maintained below regulatory limits and deliberate efforts are taken to further reduce exposures and releases "as low as reasonably achievable (ALARA)". In meeting this policy, RMRS Management shall ensure radiological operations and activities are:

1. Preplanned to allow for the effective implementation of dose and contamination reduction and control measures.
2. Performed in accordance with departmental conduct of operations requirements and shall include reasonable controls directed toward reducing exposure, preventing the spread of radiological contamination, and minimizing the generation of contaminated wastes and the release of effluent.
3. Integrating management's commitment to ALARA, which take the form of a formal, written, policy statement from the Senior Vice President of Operations.
4. Demonstrating their support of the ALARA program through direct communication, instruction, inspection of the workplace, and actions. Such actions may include management decisions that place ALARA considerations before cost or schedule considerations, encouragement of and praise for workers who identify ALARA solutions, support of the ALARA Committee, and publication of ALARA success stories.

ALARA Screening Criteria:

RMRS Managers shall request a formal ALARA review from the ALARA Committee for radiological work activities or tasks with the potential to exceed the following Radiological Controls Manual (RCM) trigger levels:

1. Individual exposure exceeding 100 mrem deep dose;
2. a collective dose of 500 mrem deep dose;
3. predicted airborne radioactivity concentrations greater than 1 Derived Air Concentration (DAC) without respiratory protection and 50 DAC with respiratory protection;
4. work area removable contamination greater than 100 times Table 2-2 values established in the RadCon Manual;
5. entry into areas where dose rates are greater than 1 rem/hr deep dose equivalent; or
6. potential radioactive releases to the environment are greater than or equal to 1 DAC.

B. The ALARA Committee

RMRS shall assign, in writing, a ALARA Program Coordinator with the responsibility to develop, implement, and document the ALARA program. This individual has the authority to carry out the program effectively. This individual report to the Director of Program Compliance directly and assists in the resolution of all ALARA issues. Quarterly reports of ALARA activities, successes and failures should be the responsibility of the ALARA Program Coordinator and should be made to the Vice President of Operations.

A multi-disciplined ALARA Committee will be established to provide guidance, resources, and oversight for the implementation of the ALARA program. This committee may be useful in forming working groups to disposition difficult ALARA issues or decisions for RMRS Managers. Members will be drawn from all organizations involved in radiological work and the committee will reinforce company wide ownership of ALARA and foster teamwork.

1. Administrative Control Levels

An annual site administrative control level for the maximum acceptable occupational radiation exposure should be established by the Senior Vice Prof Operations and the Vice President of Program Compliance based upon an evaluation of historical and projected radiation doses, workload, and mission. A set of administrative control levels below the maximum annual site administrative control level may be established with an appropriate level of managerial approval required prior to allowing an individual to exceed each level. Individual Control Limits will be determined by the other Vice Presidents for their personnel and work scope. Administrative control levels are meant to assist in the effective control of exposure by drawing attention to individual dose levels.

2. Radiological Performance Goals/Indicators

Management of the ALARA program should be facilitated by the development and management of appropriate goals and performance indicators. Program Compliance shall establish and maintain cognizance of the status of radiological performance goals. These shall be reviewed and the status published periodically. Radiological performance goals shall be evaluated and established at least annually and communicated quarterly to communicate to all levels of management and workers the performance expectations of management. Individuals responsible for planning, supervising and performing radiological work should have input into the setting of goals.