

130**Question:**

For high radiation areas (>1rem) where a flashing light is used as a TS required control, is it considered an occurrence under the Occupational Exposure high radiation area reporting element as a failure of administrative control if it is discovered that the flashing light has failed some time after the control was implemented? Failure of the light could be due to loss of its power source (dead battery or external power loss), mechanical failure (light bulb), etc.

Response:

No. The PI is intended to capture radiation safety program failures, not isolated equipment failures. This answer presumes that the controls (i.e., lights, batteries, etc.) are subject to a reasonable preventative maintenance and replacement schedule, the occurrence was isolated, and was corrected in a timely manner. However, if the light had been secured (removed, unplugged, etc.) in an unauthorized manner, without the approval of the HP management and the implementation of compensatory Part 20 controls, then this program failure would be a PI hit.

131**Question:**

This question refers to radiography work performed at a plant under another licensee's 10 CFR Part 34 license. If there is an occurrence associated with the radiography work involving loss of control of a very high radiation area or unintended dose, does this count under the occupational radiation safety PI?

Response:

No. Generally, radiography work conducted at a plant under another licensee's 10 CFR Part 34 license is outside the scope of the PI. Responsibility for barriers, dose control, etc., resides with the Part 34 licensee. The reactor regulatory oversight PIs apply to Part 50 licensee activities. However, if a individual (Part 50 licensee employee) violates any Part 50 licensee's radiation protection program requirements concerning radiography activities, it would be a PI hit if the violation (barrier failure) results in an unintended exposure greater than 100 mrem TEDE (or equivalent PI dose value). For example, a licensee establishes a RWP for entry into the barricaded high radiation area associated with radiography work. A licensee employee, or visitor, fails to comply with one or more of the RWP requirement, enters such an area, and gets a 100 mrem DDE unintended exposure.