

Large Components

Large Components Defined – A singular component or piece of equipment, created through assembly in a manufacturing or installation process, weighing in excess of 2,000 kgs that does not contain discrete sources or ion exchange resin (e.g., steam generators, steam dryers, reactor vessels, reactor vessel heads, turbine rotors, shielding blocks, etc.).

Large Component EGM Basis - Category 1 and 2 quantities of radioactive material associated with large components are considered self-protecting based upon their size, weight, and requiring specialized equipment and processes to facilitate movement. Additionally, there is significant execution time associated with any attempted theft or diversion. Area monitoring (e.g., routine work activities conducted by approved individuals, and/or observation by approved individuals located within or proximal to the storage area, and/or observation by approved individuals conducted in accordance with 10 CFR 73.55(h)(5)(ii)) in combination with the extensive measures required to attempt theft or diversion of this equipment satisfy the protection requirements of Part 37.

Robust Structures

Robust Structures Defined – Structures, or portions of larger structures, composed of materials assembled in a manner rendering them less likely to sustain significant structural compromise as a result of attempted theft or diversion of their contents. As considered within this EGM, these Robust Structures are typically designed to provide shielding from radiation exposure, limit access to their contents, and maintain their integrity for extended durations without operator action. Although habitable, they are not designed or constructed for continuous habitation. In many cases access to the interior portions of these structures and the radioactive materials contained within is gained only through removal of structural components or large access blocks requiring specialized equipment and processes. Examples include, but are not limited to: Concrete Bunkers and Modular Vaults.

Robust Structures EGM Basis - Category 1 and 2 quantities of radioactive material fully contained within a Robust Structure are considered self-protecting based upon their requiring specialized equipment and processes to facilitate access. Additionally, there is significant execution time associated with any attempted theft or diversion. Area monitoring (e.g., routine work activities conducted by approved individuals, and/or observation by approved individuals located within or proximal to the storage area, and/or observation by approved individuals conducted in accordance with 10 CFR 73.55(h)(5)(ii)) in combination with the extensive measure required to attempt theft or diversion through compromise of a Robust Structure satisfy the protection requirements of Part 37.
