

Industrial Radiography Licensee Generic Exemptions During the Emergency Caused by the COVID-19 Pandemic

4/13/2020

Reg.	Description of Exemption	Safety Basis (Operating)	Safety Basis (Closed)	Exemption Language
		Subpart C – Equipment		
34.25(b)(1)	The regulation from which the licensee is requesting an exemption is the requirement in 10 CFR 34.25(b)(1) that the licensee shall have each radiation survey instrument required in 10 CFR 34.25(a) calibrated at intervals not to exceed 6 months. The licensee requested to extend the required time interval for calibration by [the requested extension] during the emergency caused by the COVID-19 PHE.	This exemption is relatively short compared to the 6-month interval. The licensee must continue to comply with the requirement in 34.25(b)(1) to calibrate the instrument after servicing. Therefore, the exemption does not constitute a significant increase in risk to public health and safety.	The extension of calibration time does not constitute a significant increase in risk to public health and safety, because the licensee suspended operations and is not using these instruments.	From the date of the issuance of this letter, the licensee is exempt from the calibration time interval required by 10 CFR 34.25(b) for a period of 90 days. The licensee shall perform the instrumentation calibrations within 7 days of the expiration of this exemption.
34.27(c)(1)	The regulation from which the licensee is requesting an exemption is the requirement in 10 CFR 34.27(c)(1) that the licensee test sealed sources for leakage at intervals not to exceed 6 months. The licensee requested to extend the leak test interval required by paragraph (c)(1) of this	The extension provided by this exemption is relatively short compared to the 6-month interval. Therefore, this exemption does not constitute a significant increase in risk to public health and safety.	The extension provided by this exemption is relatively short compared to the 6-month interval. In addition, licensees must still perform leak tests if the sources exhibit signs that the source might be leaking. Additionally, the licensee has suspended operations, which reduces the movement of and exposure	From the date of the issuance of this letter, the licensee is exempt from the requirements to test sealed sources for leakage per 10 CFR 34.27(c)(1) for a period of 90 days. The licensee shall perform the leak testing of sealed sources within 30 days of the expiration of this exemption.

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	section by [the requested extension] during the emergency caused by the COVID-19 PHE.		to sources. Therefore, this exemption does not constitute a significant increase in risk to public health and safety.	
34.27(e)	The regulation from which the licensee is requesting an exemption is the requirement in 10 CFR 34.27(e) that the licensee test each exposure device using depleted uranium (DU) shielding and an “S” tube configuration for DU contamination at intervals not to exceed 12 months. The licensee requested to extend the DU contamination test interval required by paragraph (e) of this section by [the requested extension] during the emergency caused by the COVID-19 PHE.	The extension provided by this exemption is relatively short compared to the 12-month interval. Therefore, this exemption does not constitute a significant increase in risk to public health and safety.	The extension provided by this exemption is relatively short compared to the 12-month interval. Additionally, the licensee has suspended operations and is not using these devices, which are in locked storage. Therefore, this exemption does not constitute a significant increase in risk to public health and safety.	From the date of the issuance of this letter, the licensee is exempt for a period of 90 days, from the requirement in 10 CFR 34.27(e) to test each exposure device using depleted uranium (DU) shielding and an “S” tube configuration for DU contamination, at intervals not to exceed 12 months. The licensee shall perform the DU contamination testing within 7 days of the expiration of this exemption.
34.29(a)	The regulation from which the licensee is requesting an exemption is the requirement in 10 CFR 34.29(a) that the licensee conduct a quarterly inventory to account for all sealed sources and for devices containing	The extension provided by this exemption is relatively short compared to the quarterly interval. Therefore, this exemption does not constitute a significant increase in risk to public health and safety.	The licensee has suspended operations and is not using the sources or devices containing depleted uranium, which are in locked storage. Therefore, this exemption does not constitute a significant	From the date of the issuance of this letter, the licensee is exempt from the requirements of 10 CFR 34.29(a), for a period of 30 days, for conducting a quarterly inventory of all sealed sources and devices containing depleted uranium (DU). The licensee shall perform an inventory of sealed sources and

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	depleted uranium. The licensee requested to extend the quarterly inventory required by paragraph (a) of this section by [the requested extension] during the emergency caused by the COVID-19 PHE.		increase in risk to public health and safety.	devices containing DU within 7 days of the expiration of this exemption.
Subpart D – Radiation Safety Requirements				
34.43(d)	The regulation from which the licensee is requesting an exemption is the portion of 10 CFR 34.43(d) that requires licensees to provide annual refresher safety training for each radiographer and radiographer assistant at intervals not to exceed 12 months. The purpose of this exemption would be to allow the licensee to delay this annual training for [the requested extension] during the emergency caused by the COVID-19 PHE.	The extension provided by this exemption is relatively short compared to the 12-month interval. The licensee must continue to provide initial radiation safety training to each radiographer and radiographer assistant. Therefore, the exemption does not constitute a significant increase in risk to public health and safety.	The extension provided by this exemption is relatively short compared to the 12-month interval. The licensee must continue to provide initial radiation safety training to each radiographer and radiographer assistant. Additionally, the licensee has suspended operations. Therefore, the exemption does not constitute a significant increase in risk to public health and safety.	From the date of issuance of this letter, the licensee is exempt for 90 days, from the requirement in 10 CFR 34.43(d) to provide annual refresher safety training for each radiographer and radiographer assistant at intervals not to exceed 12 months. The licensee shall provide refresher safety training within 30 days of the expiration of this exemption.
34.43(e)	The regulation from which the licensee is requesting an exemption is the portion of 10 CFR 34.43(e)(1) that requires the licensee’s radiation safety officer or	The extension provided by this exemption is relatively short compared to the 6-month interval. Therefore, the exemption does not constitute	The exemption does not constitute a significant risk to public health and safety, because the licensee suspended operations.	From the date of issuance of this letter, the licensee is exempt for 90 days, from the requirement in 10 CFR 34.43(e)(1) that the licensee’s radiation safety officer (RSO) or designee must observe the

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	<p>designee to observe the performance of each radiographer and radiographer assistant during actual industrial radiographic operation, at intervals not to exceed 6 months. The purpose of this exemption would be to allow the licensee to delay observation of each radiographer and radiographer assistant for [the requested extension] during the emergency caused by the COVID-19 PHE.</p>	<p>a significant increase in risk to public health and safety.</p>		<p>performance of each radiographer and radiographer assistant during actual industrial radiographic operation, at intervals not to exceed 6 months. The licensee shall have the RSO or a designee perform these observations within 30 days of the expiration of this exemption.</p>