



MEMORANDUM

TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION
DIVISION OF RADIOLOGICAL HEALTH

Date: January 15, 2008

To: Division of Radiological Health (DRH) staff

From: Lawrence E. Nanney, Director 
Debra G. Shults, Deputy Director 

Subject: Policy regarding DRH staff roles and responsibilities for evaluation and oversight of the Bulk Survey for Release Program (BSFR)

In response to legislation passed in June 2007, the Solid Waste Advisory Committee (SWAC) issued its findings and recommendations in a report dated August 20, 2007 in regard to the Bulk Survey for Release (BSFR) program as implemented by the Divisions of Radiological Health and Solid Waste Management. The report outlined several improvements that needed to be made in the program including "...the five recommendations of Lisa Stetar..." Ms. Stetar served as a consultant to the SWAC during its review of the program and issued a report dated August 16, 2007.

DRH will implement those recommendations in policy and/or procedure documents, license conditions, and by utilizing the Department's website. This memo is in response to Ms. Stetar's first recommendation:

1. **Define and document staff roles and responsibilities for evaluation and oversight of the BSFR program.**

Radioactive material licensing staff -

Perform review of license application or amendment request with regard to BSFR activities including, but not limited to:

- a. general radiation safety program procedures;
- b. applicability of counting/analysis methodologies for insuring that proposed methods can detect modeled limits;
- c. evaluate proposed methodologies for waste preparation (e.g. applicability of Nuclear Regulatory Commission branch technical positions, regulatory guidance, and other pertinent documents).

Health Physics Consultant –

- a. Work with SWM to obtain the best and most current available site-specific data for computer model parameters applicable to sites used and proposed for receipt of BSFR materials;
- b. Work with licensees and applicants to obtain best available data for non-site specific model parameters;
- c. Review licensee/applicant justification for use of parameters that are at variance with site-specific data;
- d. Research parameter values where data in current guidance is questionable or with great uncertainty;
- e. Perform computer analysis for evaluation of potential doses and acceptable levels/concentrations for each site, including analysis for current site worker, closure maintenance personnel, leachate concentrations, potential future scenarios such as residential use and waste intruder/scavenger;
- f. Maintain an active working relationship with SWM personnel to keep informed of changes to sites that might impact modeled doses/concentrations and make adjustments as needed;
- g. Evaluate quarterly waste reports for compliance with conveyance limits and concentration limits;
- h. Track annual waste volumes disposed at each site and submit information for inclusion on the Department's website.

Inspection and Enforcement staff -

Inspect for compliance with commitments made in the application, license conditions, current operating procedures and Division guidance with regard to BSFR activities including, but not limited to:

- a. licensee's use of approved counting/analysis systems and the ability of the systems to detect licensed doses/concentration limits;
- b. licensee's receipt and maintenance of generator supplied waste stream profiles for licensee comparison and verification of waste type, correct isotope analysis, and correct isotope concentrations;

- c. an evaluation and review of records of dose rates at container surfaces, doses to drivers and compliance with USDOT consignment activity exemption values given in 49 CFR 173.436 or determined according to procedures in 49 CFR 173.433;
- d. an evaluation of incidents, root cause analysis, and corrective actions taken by the licensee when waste has been rejected by a site.

Technical Services staff -

- a. Collection of leachate and/or other media from approved sites for analysis;
- b. Assist inspection staff during inspections at licensed facilities;
- c. Assist inspection staff in responding to incidents at disposal sites;
- d. Assist Consultant in verifying disposal volumes.