# JOINT COMPANY/UNION SAFETY COMMITTEE CONCERN FORM

(Use Black Ink Only)

Case No. 90-051

Employee Name [redacted] Employee Number [redacted]

Department HS&EL Bldg. 123 Phone [redacted] Shift DAY

I have previously discussed this concern with my supervisor: ✓ Yes ____ No

**Concern** (briefly) THE AIR FILTER COUNTING SYSTEM IN ROOM 163, BLDG 123, RECEIVES AIR FILTER SAMPLES OVER 250 C/M OR 20 D/M. ANY SAMPLE OVER THOSE LIMITS POSE A HEALTH AND SAFETY HAZARD, AND SHOULD BE RETAINED IN A CONTROLLED AREA WITH PROTECTIVE CLOTHING AND PROPER VENTILLATION FOR COUNTING

[redacted] Jan 22, 1990

Employee Signature Date

**Immediate Supervisor Response** (within 5 working days)

As you know, Charlene, I have turned this concern over to OHP. We (you, Larry H. & I) met with them & all decided to await further clarification by them on the concern. I intend to push this one to a safe conclusion - but need to get the advise of the experts (OHP)

Mark Peters 1/22/90

Supervisor Signature (legibly please) Date

J. L. Alvarez 1-24-90

Direct Report Manager Signature Date

**NOTE: Timeliness in completing this form is of the utmost importance.**

____ I am satisfied with the results.

__X__ I am not satisfied. Referral to the JCUSC for investigation because:

I approached Mark & OHS 2 weeks prior to turning in a Safety Concern OHS was supposed to get back with us. but ~~apt~~ appointment Keeps getting Cancelled

**To be completed by the JCUSC Co-Chairperson(s)**

Assigned To: Union: J. San Pietro Date 1/31/90

Company: GD Waggoner Date 1/31/90

Distribution: White - Safety Committee; Yellow - Supervision; Green - Employee; Goldenrod - Union Steward

RF-45500 (Rev. 11/86) Destroy Previous Issues

SAFETY CONCERN WORKSHEET
(Please Print)

GENERAL INFORMATION:

(*2) Date Received: 1/30/90 (*1) Number: 90-051(_)

(3) Priority (H,M,L): M

(*4) Title: Air Samples

(5) Initiated by: CM Wise (6) Emp. Number: 512526

(*7) Initiation/Start Date: 1/22/90 (8) Emp. Phone No: 5568

MANAGEMENT INFORMATION:

(9*) Supervisor/Person Resp: M. Peters (*10) Phone: 2322

(11) Date Supervisor Answered: 1/22/90

(12) Direct Report Manager: JL Alvarez (13) Phone: 2206

(14) Bldg: 123 (15) Bldg. Manager: GL Potter

SAFETY NOTIFICATIONS:

(17) Date: 1/31/90

(16) Discipline: JM Langsted Bldg: 790

(18) Area Safety Eng: G. Shearer Bldg: T690C

(19) Union Steward: _____ Bldg: _____

(20) Co. Co-Chairman: E. Tietenberg Bldg: T452B

(21) Union Co-Chair: S. Cordova Bldg: T690G

(22) Company Member: G.D. Waggoner Bldg: 334

(23) Union Member: ~~J.B. San Pietro~~ L. Samora Re-assigned 2/20/90

INVESTIGATION STATUS:

(25) Date Contacted Employee: __/__/__

(*26) Investigation Comments: _____

(*27) Invest. Review/Due Date: __/__/__ (28) Status (1-5) __

(29) Actions Indent. (Y or N): __ (30) Interim Letter Date: __/__/__

(*31) Close Date: __/__/__ (*32) Closed By: _____

*To be filled out when submitting action items*

EG&G ROCKY FLATS

# INTEROFFICE CORRESPONDENCE

DATE April 25, 1990 OHP-89-90

TO C. D. Waggoner/J. L. San Pietro

FROM W. M. Somers, OHP, Bldg. 750, X5725 WMS

SUBJECT SAFETY CONCERN 90-051

Currently filters are initially screened for radioactivity in the areas and are not allowed to leave the area if the count rate is greater than 2500 cpm. A smear survey is performed in the count room and on the air sample canisters on a daily basis. The results of the smear surveys are all well below the limit of 20 dpm/100 $cm^2$. Air samplers are also located in the room. Results of the samples are attached and indicate air concentrations in the room are at normal ambient levels.

The controls currently in place are adequate to ensure the highly contaminated samples do not leave the area which could be a hazard.

WMS:emh

A. Buckie
D. C. Hunt
E. D. Lesses
M. A. Peters
J. A. Ray

Courtroom is Room 163

EG&G ROCKY FLATS USWA

# JOINT COMPANY - UNION SAFETY COMMITTEE

September 11, 1990

To: S. Cordova / E. I. Tietenberg
Co-Chairmen J.C.U.S.C.
T-690-G
Ext. 5800 / Ext. 7620

From: E. L. Samora / C. D. Delforge
J.C.U.S.C.
T-690-G
Ext. 5801 / Ext. 4769

**RE: SAFETY CONCERN NUMBER 90-212**

Safety concern number 90-051 was worked and elevated to the co-chairmen's level. Concern number 90-212 deals with the same subject as 90-051. Elliott Lessers of Radiological Engineering told me that he would work this issue. If you have any questions, please feel free to discuss them with me.

E. L. Samora
Union Safety Representative

el90-212.ls

EG&G ROCKY FLATS

USWA

# JOINT COMPANY - UNION SAFETY COMMITTEE

File

October 22, 1990

To: J. R. Majestic
Director Health & Safety
Building 123
Ext. 4707

From: E. I. Tietenberg / S. Cordova
JCUSC
T-690-G
Ext. 7620 / Ext. 5800

RE: ELEVATION OF SAFETY CONCERN NUMBER 90-212 / CONTAMINATED SAMPLES COUNTED IN BUILDING 123

Safety concern number 90-212 has been elevated to the director level for resolution as per Company/Union contract language, Article XIV, Section 12, Paragraph D, Subparagraph 6.

The Joint Company/Union Safety Committee Co-Chairmen will contact your secretary for time on your calendar in order to meet and resolve the safety concern. Included is a packet of all information dealing with the safety concern.

E. I. Tietenberg
Company Safety Co-Chairman

S. Cordova
Union Safety Co-Chairman

cc:
C. D. Delforge
E. L. Samora

Enclosure: As stated

el90-212.et

EG&G ROCKY FLATS

USWA

# JOINT COMPANY - UNION SAFETY COMMITTEE

January 18, 1991

To: J. R. Majestic
Health and Safety
Deputy Assistant General Manager
Building 123
Ext. 4707

From: E. I. Tietenberg / S. Cordova
JCUSC Co-Chairmen
T-452-B / T-690-G
Ext. 7620 / Ext. 5800

RE: MANAGEMENT ACTION / SAFETY CONCERN NUMBER 90-051 AND 90-212 / AIR FILTER COUNTING

On October 30, 1990, a meeting was held with you and members of your staff pertaining to the subject safety concerns.

The issue discussed was contaminated filters from the air heads being brought out of the Radiation Controlled Area (RCA) into uncontrolled areas in building 123 to be counted. The JCUSC requested you to respond in writing as to what actions were being taken to alleviate the concern. The response was to be provided by November 6, 1990.

To date, the JCUSC has not received any information or actions being taken by you or your staff to resolve the issue.

Attached for your information are the safety concerns and related documentation.

Please provide the JCUSC the previously requested information by January 31, 1991

E. I. Tietenberg
Company Safety Co-Chairman

S. Cordova
Union Safety Co-Chairman

Attachment:
As Stated

cc:
E. Crusan
C. D. DelForge
E. L. Samora

up90-212.051

# United Steelworkers of America

AFL-CIO-CLC

Local Union 8031 4510 Indiana Street Golden, Colorado 80403

January 30, 1991

To: J. P. Jens
Health and Safety
Assistant General Manager
T-130-G

From: E. L. Samora, Jr.
Union Safety Committee
T-690-G
Ext. 5298 / D-1752

RE: SAFETY CONCERN NUMBERS 90-051, 90-212, AND 90-426

This letter is an official position of the United Steelworkers on safety concern numbers 90-051, 90-212, and 90-426. All three safety concerns deal with the air sample levels received in building 123, room 163. Room 163 in building 123 does not meet the requirements of a radiation control area by any standard. By sending air samples to building 123 from the radiological control areas greater than 250 counts per minute and greater than 20 disintegrations per minute, we are exposing our members, the environment, and the public to an unnecessary risk.

Administrative controls are not an adequate substitute for engineered features. Operational measures for controlling occupational exposure must be applied to assure that any work with radioactive materials is carried out in the safest manner that is achievable. The RCA areas located in the PSZ have the engineering controls to do this job safe and efficient. This would seem the logical place to do this work, since we have everything in place to accommodate this specific job junction.

These concerns were brought to EG&G twelve months ago and to this date, EG&G has not offered a safe resolution.

E. L. Samora, Jr.
Union Safety Representative

cc:
S. A. Buckie
S. Cordova
R. J. Fleischacker
J. R. Majestic, Jr.
R. M. Nelson
R. E. Williams
J. O. Zane
J. Castro
C. D. DelForge
D. M. Hardin
J. L. Nazzise
E. I. Tietenberg
C. M. Wise

up51-212.426

# EG&G ROCKY FLATS

EG&G ROCKY FLATS, INC.
ROCKY FLATS PLANT, P.O. BOX 464, GOLDEN, COLORADO 80402-0464 • (303) 966-7000

February 26, 1991

91-RF-0749

E. L. Samora, Jr.
Union Safety Representative
United Steelworkers of America
Local Union 8031

SAFETY CONCERN NUMBERS 90-051, 90-212 and 90-426

Thank you for your letter of January 30, 1991 (Attachment 1) calling to my attention the official Steelworkers position. The Steelworkers position is no different of the one that applies to all EG&G Rocky Flats Plant employees, since providing a safe working environment for all employees is essential if we are to succeed.

As you are aware, the subject concerns were elevated to Director level on September 11, 1990 and a follow-up meeting was held with my staff of January 28, 1991. At that time, the Co-chairman reiterated that a written response would be required as to what actions are being taken and what actions are planned to resolve the issue. My staff is working diligently to come up with the best and safest course of action that meets the requirements of the Department of Energy (DOE) Order and allows us to perform air head filter counting operations in the safest manner possible.

As soon as my staff has developed a plan with a satisfactory course of action, I will notify the Co-chairman in writing who will, in return, provide it to you.

Thank you for your concern and dedication.

J. P. Jens
Assistant General Manager
Health and Safety

JPJ:djh

Attachment:
As Stated

cc:
J. Castro
S. Cordova

# EG&G ROCKY FLATS

EG&G ROCKY FLATS, INC.
ROCKY FLATS PLANT, P.O. BOX 464, GOLDEN, COLORADO 80402-0464 • (303) 966-7000

March 15, 1991

91-RF-1224

E. L. Samora, Jr.
Union Safety Committee
T690G

SAFETY CONCERN NUMBERS 90-051, 90-212, AND 90-426 (JPJ-35-91)

EG&G Rocky Flats, Inc. Health and Safety recognizes the position of the United Steelworkers of America on the subject safety concerns. Building 123, Room 163 has been designated as a Radiologically Controlled Area (RCA) and is being currently controlled as such. The statement that this room "does not meet the requirements of a Radiation Control Area under any standards" is incorrect. In addition, all the labs and other rooms in Building 123 that have been identified as areas where work with radioactive materials takes place have been posted as RCA's.

The statement "Administrative controls are not an adequate substitute for engineered controls",is only an appropriate statement when engineered controls are necessary. The counting of air samples and the processing of low level laboratory samples in Building 123 does not expose workers, the public or the environment to any unnecessary risk. Engineered controls are not necessary to safely perform these tasks. A detailed analysis of each RCA and associated requirements will follow under separate cover letter.

A review of the previous concerns on Selective Alpha Air Monitor (SAAM) repair indicates that the strengthened administrative controls were adequate to protect workers, the public and the environment. Although these controls are adequate, we concur that there is a better way of doing business. We shall revisit Perimeter Security Zone (PSZ) locations and alternative engineering controls for disassembly.

In reference to the suggestion that locating the air sample count room inside the PSZ, please be advised that we are working to this end. The necessary counting equipment (automatic sample changing and recording) has been requisitioned and is in the purchase cycle. All possible locations inside the PSZ that might meet the necessary location criteria will be evaluated.

Moving the count room inside the PSZ will require 1) adequate facilities for the equipment and personnel, 2) minimal exposure rates for worker protection and instrument efficiency and 3) no Airborne Radioactivity or Contamination Area potential. Upon receipt of the list of "The RCA areas located in the PSZ" which you feel "have the necessary engineering controls to do this job safely and efficiently", a formal evaluation for relocation of the count room will be conducted.

A proposed action plan to bring this issue to a "safe resolution" and closure of these concerns is as follows:

1. Develop criteria and necessary actions required to move the air sample count room to a "PSZ Location"
   R. L. Renne/K. E. Cavin

2. Prepare list of suitable locations inside the PSZ for evaluation
   E. L. Samora/L. G. Ubias

3. Select final location(s) and obtain occupancy
   E. L. Samora/K. E. Cavin/J. P. Jens/Operations Managers

4. Move air sample count room
   R. L. Renne

J. R. Jens
Assistant General Manager
Health and Safety
EG&G Rocky Flats

KEC:kas

cc:
G. M. Aldrich
S. A. Buckie
K. E. Cavin
D. M. Hardin
J. R. Majestic
J. G. Quillin
R. L. Renne
E. I. Titenberg
L. G. Ubias

EG&G ROCKY FLATS

90-071

# INTEROFFICE CORRESPONDENCE

DATE: April 3, 1991 ET91-110

TO: Distribution

FROM: E. I. Tietenberg / S. Cordova, Co-Chairmen Joint Company/Union Safety Committee (JCUSC), T-452-B / T-690-G, X7620 / X5800

SUBJECT: WRITTEN STATUS AND PENDING ACTIONS ON ELEVATED JCUSC SAFETY CONCERNS

ELEVATED CONCERNS

On March 21, 1991, J. P. Jens, AGM Health and Safety, requested that written status be provided to the JCUSC Co-Chairmen on elevated concerns requiring AGM action. To date, no written status has been received.

This letter is to remind you that this requirement still exists, and please provide a written status on elevated concerns (attachment 1) to the JCUSC Co-Chairmen by April 12, 1991.

For any additional information, please feel free to contact Enn Tietenberg at extension 7620, or Steve Cordova at extension 5800.

cmp

Attachment:
As Stated

Distribution

A. Benjamin
J. C. Bretzke
E. H. Ideker
J. P. Jens
J. M. Kersh
V. M. Pizzuto

cc:
C. W. Buchholz
E. A. DiCarlo
P. W. Dooley
I. K. Roberts
E. L. Samora
D. T. Sandoval
T. J. Tegeler

EG&G ROCKY FLATS

# INTEROFFICE CORRESPONDENCE

DATE: April 22, 1991 JGQ-012-91

TO: E. I. Tietenberg, Joint Company/Union Safety Committee, Bldg. T452B, X7620
S. Cordova, Joint Company/Union Safety Committee, Bldg. T690G, X5800

FROM: J. G. Quillin, Radiological Health, Bldg. 123, X2452 JGQ

SUBJECT: STATUS REPORT ON SAFETY CONCERN NUMBERS 90-051 AND 90-212

The "proposed action plan" identified in J. P. Jens letter to E. L. Sumora, on March 15, 1991, (91-RF-1224) is still in process. Prospective suppliers of counting equipment have been identified. The Health Physics Instrumentation Committee (HPIC) has responsibility for approving performance criteria and allocation of funds. Funds have been allocated and purchase specifications are being drafted. The remaining items are progressing as well.

Additional measures have been implemented to aid in assuring safety. Specifically, the Air Sample Counting Room (163) in Building 123, has been classified as a "Controlled Area." As such certain precautionary measures are in place:

- No eating, drinking, smoking, or other consumables.
- Personal dosimeter required when handling radioactive materials.
- Wear buttoned smocks and surgeons gloves when handling radioactive materials.

Also, Radiation Protection Technologists perform daily contamination surveys of the room and on incoming air sample containers. Individuals working in the area are considered radiation workers and are participants in the Radiation Worker Training course.

We believe that these precautionary actions in combination with compliance regarding existing procedures, (ROI 4.1, "Routine Air Sampling" in particular), provide adequate measure of safety for the individual worker as well as members of the general public and the environment.

Please feel free to contact me should additional information or clarification be required.

bdm

cc:
S. A. Buckie
K. E. Cavin
D. M Hardin
D. C. Hunt
J. P. Jens
C. Trice
Safety Concerns File

EG&G ROCKY FLATS

USWA

# JOINT COMPANY - UNION SAFETY COMMITTEE

DATE: September 20, 1991

TO: E. L. Samora, Rad Ops PU Ops, Bldg. 371, X7060
E. DiCarlo, Joint Company/Union Safety Committee (JCUSC), Bldg. 881, X5130

FROM: E. I. Tietenberg, JCUSC, Bldg. 452TB, X7620
M. F. Wood, JCUSC, Bldg. 690TG, X5800

SUBJECT: RESOLUTION OF ELEVATED SAFETY CONCERN: 90-051
CONTAMINATED SAMPLE COUNTING IN BUILDING 123

The subject safety concern was elevated to the co-chairman level on September 11, 1990. A meeting was held with J.R. Majestic on October 30, 1990 where various corrective actions were identified. Subsequently the laboratories in building 123 were designated as radiologically controlled areas with daily contamination surveys being performed by Radiation Protection Technologist. Further, ROI was reviewed and actions were taken to insure that samples that exceed allowable count are not removed from RCA's.

By the above actions the Co-Chairmen consider the concern closed.

E. I. Tietenberg
Company Co-Chairman

M. F. Wood
Union Co-Chairman

cc:
S. A. Buckie
D. C. Hunt
J. P. Jens
J. R. Majestic
J. L. Nazzise
J. G. Quillin
V. Scott
G. Trice
C. Weise
W. G. Zurliene

EG&G ROCKY FLATS

USWA

# JOINT COMPANY - UNION SAFETY COMMITTEE

Date: October 08, 1991

TO: J. R. Majestic, Health & Safety, Bldg., 123, X4707

FROM: E. I. Tietenberg / M. F. Wood, Joint Company/Union Safety Committee (JCUSC), Bldg. T452B / Bldg. T690G, X7620 / X5800

SUBJECT: ELEVATION TO AGM OF SAFETY CONCERN : 90-051 EL90-051
CONTAMINATED AIR SAMPLES, BLDG. 123

Safety concern number 90-051 has been reopened, which had been elevated to the AGM/Director level for resolution as per Company/Union contract language, Article XIV, Section 12, Paragraph C, Subparagraph 6.

The concern is being reopened due to samples being found in excess of 250 cpm in Building 123 on September 23, 1991.

The Joint Company/Union Safety Committee Co-Chairman will contact your secretary for time on your calendar in order to meet and resolve the safety concern. Included is a packet of all information dealing with the safety concern.

E. I. Tietenberg
Company Safety Co-Chairman

M. F. Wood
Union Safety Co-Chairman

bjm

cc:
G. M. Aldrich
S. A. Buckie
E. A. DiCarlo
D. L. McCoy
J. A. Quillin
C. Trice
R. B. Wilkinson
C. Weise

EG&G ROCKY FLATS USWA

# JOINT COMPANY - UNION SAFETY COMMITTEE

DATE: October 09, 1991

TO: [redacted], Rad Hlth Labs, Bldg. 123, X[redacted]

FROM: E. I. Tietenberg / M. F. Wood, Joint Company/Union Safety Committee (JCUSC), Bldg. 452TB / Bldg. 690TG, X7620 / X5800

SUBJECT: ASSIGNMENT OF SAFETY CONCERN: 90-051
AIR SAMPLES

The Joint Company/Union Safety Committee (JCUSC) has received your safety concern and assigned the following investigators. They will contact you to discuss this concern.

Company Representative: E. A. DiCarlo Phone: 5130

Union Representative: D. L. McCoy Phone: 5298

cc:
J. R. Cable
E. A. DiCarlo
J. M. Langsted
D. L. McCoy
J. G. Quillin
G. D. Shearer
L. C. Smith

EG&G ROCKY FLATS

USWA

# JOINT COMPANY - UNION SAFETY COMMITTEE

DATE: November 7, 1991

TO: M. T. Sullivan, Radiation Protection, Bldg. T130H, X6629

FROM: E. I. Tietenberg, Joint Co/Union Safety Comm. Bldg. T452B, X7620
M. F. Wood, Joint Co/Union Safety Comm. Bldg. T690G, X5800

SUBJECT: ELEVATION OF SAFETY CONCERN 90-051 TO AGM/DIRECTOR LEVEL CONTAMINATED AIR SAMPLES, BLDG. 123

Safety concern number 90-051 has been elevated to the AGM/Director level for resolution as per Company/Union contract language, Article XIV, Section 12, Paragraph C, subparagraph 6.

The subject safety concern was elevated to J. R. Majestic on October 8, 1991. Due to reorganization and your assuming responsibilities for Radiological Protection, the concern is reassigned to you for resolution and action.

The Joint Company/Union Safety Committee Co-Chairman will contact your secretary for time on your calendar in order to meet and resolve the safety concern. Attached is a packet of all information dealing with the safety concern.

E. I. Tietenberg
Company Safety Co-Chairman

M. F. Wood
Union Safety Co-Chairman

Attachments:
As Stated

cc:

G. M. Aldrich
E. A. DiCarlo
E. H. Ideker
J. R. Majestic
D. L. McCoy
J. G. Quillin
C. Trice
C. M. Wise
W. G. Zurliene

EG&G ROCKY FLATS

USWA

# JOINT COMPANY - UNION SAFETY COMMITTEE

DATE: April 21, 1992

TO: [redacted], Rad Hlth Labs, Bldg. 123, X[redacted]

FROM: E. I. Tietenberg, Joint Co./Union Safety Comm., Bldg. T452B, X7620
M. F. Wood, Joint Co./Union Safety Comm., Bldg. T690G, X5800

SUBJECT: ASSIGNMENT OF SAFETY CONCERN: 90-051
AIR SAMPLES

The Joint Company/Union Safety Committee (JCUSC) has received your safety concern and assigned the following investigators. They will contact you to discuss this concern.

Company Representative: J. A. Ray Phone: 5130

Union Representative: D. L. McCoy Phone: 5298

cc:
J. R. Cable
J. M. Langsted
D. L. McCoy
J. G. Quillin
J. A. Ray
V. M. Scott
G. D. Shearer

5.8.2 Defective parts should be replaced with parts stocked in the Radiological Operations office.

CAUTION

PROBES OF THE FLOW METER ARE VERY DELICATE, DO NOT SHOCK THEM. IF THE TIP IS BROKEN OR DIRTY, DO NOT USE SINCE THE READINGS WILL BE INVALID.

6.0 INSTRUCTION

6.1 Filter media of fixed airhead samplers shall be routinely changed as follows:

6.1.1 Survey filter caps before unscrewing.

6.1.2 Unscrew and remove the air filter cap.

6.1.3 Survey the filter media with an alpha survey meter (Ludlum Model 12-1A Count Rate Meter with an air proportional probe).

6.1.4 Record the survey meter reading of the filter in counts per minute (cpm) and the filter number in the Air Sample Travel Log (Attachment 9.1).

6.1.5 Remove the filter media by handling the brass ring. Do not touch the filter media.

6.1.6 Place filters which measure less than 2500 cpm in the top of the air sample carrier tube sample side up.

6.1.6.1 Place filters which measure more than 2500 cpm in glassine envelopes. These will be counted as "special" samples.

6.1.6.2 Write the filter number, the date, and sample (on/off) time on each envelope using a black marking pen.

ROUTINE AIR SAMPLING

1.0 PURPOSE

To establish requirements for routine air sampling operations.

2.0 SCOPE

This instruction provides requirements for changing filter media of fixed air samplers, counting special air samples, calibrating airflow rates of airhead samplers, issuing required air sampling reports, and performing preventive maintenance of airhead samplers.

3.0 DEFINITIONS

3.1 Fixed air samplers consist of all airhead samplers and SAAMs used for room and effluent air monitoring.

3.2 Koval Factor (K) is a unit used in calculating air sample radioactivity which adjusts for the decay of short-lived radionuclides when sample counts are spaced in time. In calculations, K is used to designate the Koval Factor.

3.3 DAC is the acronym used to designate Derived Air Concentration. DAC values are specified (DOE Order 5480.11) for each radionuclide and their retention class, and are the limiting values for control of airborne radioactivity in the work place.

3.4 Airborne Radioactivity Area is the designated area posting required for areas where airborne radioactive material concentrations greater than 1/10 of the DAC are present.

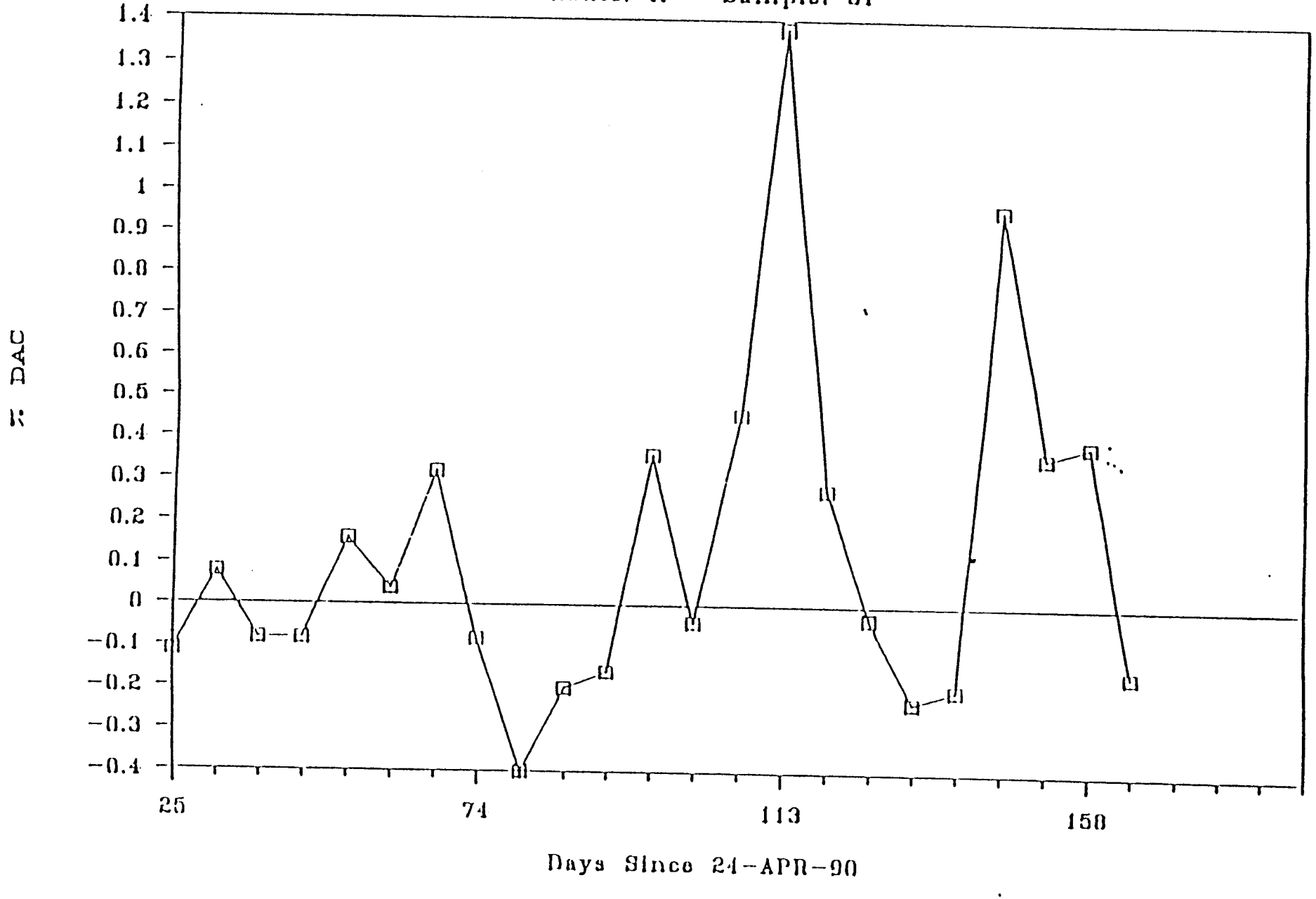
3.5 Special air samples consist of any routine air samples having a survey instrument reading of more than 2500 cpm, or the filter from a positive SAAM alarm with 25 cpm or greater on a referee SAAM.

4.0 RESPONSIBILITIES

4.1 Manager(s) of personnel required to perform work per this instruction shall ensure that affected personnel are informed or trained to the extent necessary prior to initiation of that work.

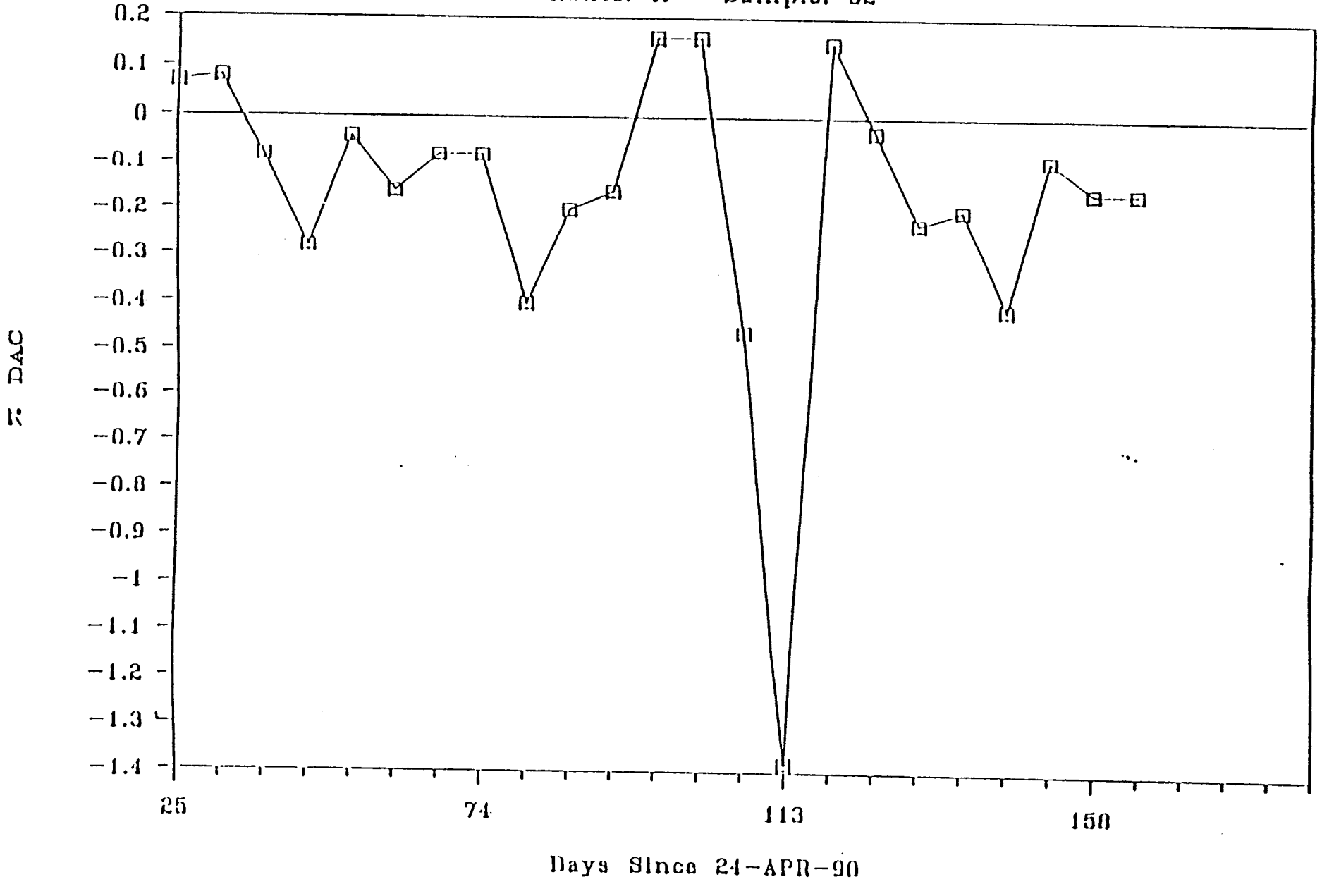
# Building 123

Route: II Sample: 31



# Building 123

Route: II Sample: 32



# United Steelworkers of America

AFL-CIO-CLC

Local Union 8031

Rocky Flats, Colorado

41-

September 10, 1985

G. Campbell
HS&E
Bldg. 111
Rocky Flats Plant

SUBJECT: Safety Concern 85-64, Unnecessary Exposure to Radioactive Material in the Sample Counting Room (163) in Building 123

The Company and Union cannot reach an agreement for resolution to this Safety Concern. Some improvements have been made, however, further improvements are necessary. A new procedure has been written for this area, but we feel it does not go far enough; a copy of this new procedure is attached. L. J. Olinger, Opr. Health Physics, was contacted about further improvements which the Union feels are necessary. Her reply, "further precautions are redundant beyond reasonable for the level of hazard which exists", exhibits arrogance and is certainly argu-ntive, to say the least. This type of attitude is not conducive to a good working relationship between the Safety Committee and Health Physics. 10/4/85

The Union does take exception to this reply and our recommendations for Room 163, Building 123 are as follows:

1. Room air samples be installed.,
2. At least one S.A.M. air monitor be installed.
3. Alpha mets with cables be installed on the counting instruments.
4. A combo be placed at the door.
5. Protective clothing be required for personnel working in this room. This is meant to include coveralls, booties and surgeon's gloves which are to be worn when handling samples.
6. The sample containers must be monitored before leaving the PSZ area buildings and the M.T. tag signed by a monitor.
7. If a sample is suspected to be "hot" or greater than the counting instrument will count, the proper protocol is as follows:
   a) Call Radiation Monitoring in Bldg. 881 for a monitor to respond to the area. The telephone number should be placed by each telephone in a visible area.
   b) Do not remove the suspected sample from the counting instrument. When the radiation monitor arrives, he/she will remove the sample.
   c) If the sample is found to be greater than 100% of R.C.G. by the monitor, then the radiation monitoring supervisor of the affected area will be notified immediately so the area in question will be posted for respirators and surveys taken.

James D. Kelly
President

Ted Tegtier
Vice President

Michael T. Davidson
Recording Secretary

John A. Cash
Financial Secretary

Patrick F. Kelly
Treasurer

# United Steelworkers of America

AFL-CIO-CLC

Local Union 8031 — Rocky Flats, Colorado



d) Have the radiation monitor perform a smear survey of the area to check for levels of contamination that exceed the 20d/m/100 c/m.
e) Personnel will be monitored out by the radiation monitor.
f) Have the radiation monitor secure the sample and return it to the area of origin for special counting procedures.

8. Personnel will be monitored out by a radiation monitor at the end of their shift.
9. All counted samples must be secured at the end of the shift and when appropriate, the samples will be taken back to a building inside the P.S.Z. for disposal.

The Union feels that the ideal area for counting samples would be inside the P.S.Z. area. If this is not possible, it is imperative every effort be made to insure that no Pu will be released to an area where personal clothing is worn and/or possibly taken off site into someone's home or place of business.

We feel that Rockwell International owes its employees, their families and the surrounding communities assurance that every possible precaution is taken to prevent the unnecessary spread of radioactive contamination.

J. San Pietro

J. SanPietro
J.C.U.S.C.
Union Member

cc:
J. Aldrich
J. Castro
R. DelPizzo
R. Link
C. A. Noble
J. Ortiz

Attachment

Rockwell International
Aerospace Operations
Rocky Flats Plant



# PERSONNEL PROTECTION REQUIREMENTS FOR PLUTONIUM CONTROLLED AREAS

## 1. SCOPE

To define the minimum requirements for personnel protection in plutonium processing areas, laboratories, storage facilities, or any other area posted as a Plutonium Controlled Area.

## 2. DEFINITIONS

2.1 Administrative Work - Performing job reviews, reviewing and/or picking up paper work, changing computer disks, incidental work on computer keyboards and all other similar activities.

2.2 Anti-Contamination (Anti-C) Clothing - More stringent Company-furnished protective clothing that may be required by Radiological Monitoring and/or Operational Health Physics for specific jobs and/or operations. Full Anti-C clothing consists of paper coveralls, hoods, gloves, shoe covers and/or boots. this clothing shall be worn in addition to normal precautionary clothing for the purpose of radiological/contamination control and shall not be worn outside the controlled areas.

2.3 "B" Box - Rocky Flats terminology for containment structure/work box partially open to room atmosphere with restricted openings.

2.4 Contamination - The deposition or presence of unwanted radioactive material on the surfaces of structures, areas, objects or personnel.

2.5 Controlled Area - Any area to which access is controlled in order to protect individuals from exposure to radiation and radioactive materials.

2.6 Precautionary Clothing and Equipment - Company-issued clothing and equipment which workers may be required to wear in controlled areas. This may include items such as coveralls, safety shoes, underwear, etc. Precautionary clothing and equipment are worn as a precautionary measure to avoid contaminating personal clothing or a worker's skin in case there is an inadvertent release of contamination. Precautionary clothing is not intended to substitute for anti-contamination clothing and shall not be used as anti-contamination clothing.

2.7 Radiation - As used in this document, indicates alpha, beta, gamma, X-ray and neutron types of ionizing radiation.

2.8 Radiation Area - As used in this document, indicates any area within a controlled area where an individual can receive a dose equivalent greater than

2 mrem, but less than 100 mrem, in 1 hour at 30 cm from the radiation source or from any surface through which the radiation penetrates.

## 3. GENERAL RESPONSIBILITIES

### 3.1 Operational Health Physics

Operational Health Physics will establish the occupational radiation protection program to support the long-term and short-term planning, as well as the day-to-day activities, of the Rocky Flats Plant.

### 3.2 Radiological Monitoring

Radiological Monitoring will assist all operations with the implementation of the radiation safety program in order to maintain radiation levels and personnel radiation dose equivalents as low as reasonably achievable (ALARA).

### 3.3 Building Managers

The Building Managers are responsible for the safety of building personnel facility maintenance and environmental protection of their respective facilities. Operational Health Physics works with the Building Managers to establish the radiation protection program of building personnel and facilities.

### 3.4 HS&E Area Engineer

The HS&E Area Engineer is responsible for programmatically managing a multi-disciplinary safety team, ensuring effective communications within the HS&E organization and with all other supervisory personnel, and implementing of the ALARA policy.

### 3.5 Criticality Engineering

Criticality Engineering has the primary responsibility for generating and recommending nuclear criticality safety policies for Rocky Flats and establishing procedures which implement the established nuclear criticality safety policies.

### 3.6 Supervision

3.6.1 It is the responsibility of all supervisors to be acquainted with all aspects of their operations which involve radioactive materials. All supervisors shall ensure that their operations are carried out according to the requirements of this document and the ALARA policy.

3.6.2 In the discharge of their responsibilities, supervisors shall seek the technical support of Health, Safety and Environment. Supervisors shall submit to Operational Health Physics all available information on any changes or alterations contemplated in their area of responsibility which may affect the radiation or contamination control programs.

4.3.4.1 All individuals have the responsibility to properly use the self monitoring devices as described in HS&E 18.09 in order to prevent the spread of radioactive contamination.

4.3.4.2 When leaving a controlled area, all personnel must be monitored by Radiological Monitoring. The Radiation Monitor shall also monitor the respirator, dosimetry badge, shoe bottoms and other items as appropriate (e.g., paperwork, notebooks, etc.) using the Ludlum Alpha Survey Meter. All items leaving a controlled area shall be smeared for removable contamination in addition to being monitored with a Ludlum instrument.

4.3.4.3 Personnel must wash their hands upon exiting the controlled areas.

4.3.4.4 Personnel working in controlled areas, who make a clothing change, SHALL shower prior to leaving plantsite. In addition, these personnel shall wash their hair.

4.3.5 Control and Decontamination of a Radioactive Material Release

4.3.5.1 Radiological Monitoring personnel will determine the location and extent of any radioactive material release, recommend appropriate control measures, and furnish supervision with written reports as necessary.

4.3.5.2 Decontamination of a radioactive material release must begin immediately and be completed as rapidly as possible. Decontamination shall be continued beyond the end of a shift or until the contamination is secured. If decontamination efforts are stopped before decontamination is completed, approval must be obtained from Radiological Monitoring and appropriate supervision.

4.3.5.3 Detectable levels of radioactivity from former plant processes, which have contributed to the overall background radioactivity level[illegible] not be allowed to remain as a part of the facility area which is being [illegible]minated for future unrestricted use.

4.3.6 Personnel Airlocks and Step-off Pads

4.3.6.1 Personnel airlocks are installed between plutonium controlled areas and non-controlled areas to assist in maintaining proper airflow and contamination control.

4.3.6.2 When using personnel airlocks, only one door or one set of double doors shall be open at any time except for emergency egress.

4.3.6.3 Step-off pads (bootie lines) are used to assist in isolating contamination to controlled areas. Upon entering or exiting controlled areas, employees shall follow the posted procedures for proper step-off pad use.

4.3.7 Glovebox Operations

4.3.7.1 Supervisors shall ensure that all of their employees who work in gloveboxes are trained in the safe and proper methods of glovebox operation.

8.0 MATERIALS

- Black ink pen
- Forms: Record of Items Leaving Radiation Controlled Areas
- Leather gloves (as required)
- Smear paper

9.0 STANDARDIZATION AND CALIBRATION

9.1 The Ludlum 12-1A Count Rate Meter and the Ludlum Model 31 shall be calibrated annually in accordance with Radiation Instrumentation procedures. The instruments shall be performance tested daily, or prior to use.

9.2 The SAC-4 Scintillation Smear Counter is calibrated annually in accordance with Radiation Instrumentation procedures and performance tested each shift (or prior to use) according to ROI 6.3, Operation and Performance checking of Alpha Scintillation Smear Counting Instrumentation.

9.3 Surface Contamination Limits for Release of Materials to Uncontrolled Areas:

Table I

Alpha Surface Contamination Limits For Release of Materials to Uncontrolled Areas

| | Limit | Instrument |
|---|---|---|
| Removable | 20 dpm/100 cm² | SAC-4 |
| Total (Fixed & Removable) | 250 cpm | Ludlum 12-1A |

Table II

Beta/Gamma Surface Contamination Limits For Release of Materials to Uncontrolled Areas

| | Limit | Instrument |
|---|---|---|
| Removable | 200 cpm* | Ludlum - 31 |
| Total (Fixed & Removable) | 200 cpm* | Ludlum - 31 |

*See Section 10.2

5.8.2 Defective parts should be replaced with parts stocked in the Radiological Operations office.

CAUTION

PROBES OF THE FLOW METER ARE VERY DELICATE, DO NOT SHOCK THEM. IF THE TIP IS BROKEN OR DIRTY, DO NOT USE SINCE THE READINGS WILL BE INVALID.

6.0 INSTRUCTION

6.1 Filter media of fixed airhead samplers shall be routinely changed as follows:

6.1.1 Survey filter caps before unscrewing.

6.1.2 Unscrew and remove the air filter cap.

6.1.3 Survey the filter media with an alpha survey meter (Ludlum Model 12-1A Count Rate Meter with an air proportional probe).

6.1.4 Record the survey meter reading of the filter in counts per minute (cpm) and the filter number in the Air Sample Travel Log (Attachment 9.1).

6.1.5 Remove the filter media by handling the brass ring. Do not touch the filter media.

6.1.6 Place filters which measure less than 2500 cpm in the top of the air sample carrier tube sample side up.

6.1.6.1 Place filters which measure more than 2500 cpm in glassine envelopes. These will be counted as "special" samples.

6.1.6.2 Write the filter number, the date, and sample (on/off) time on each envelope using a black marking pen.

ROUTINE AIR SAMPLING

1.0 PURPOSE

To establish requirements for routine air sampling operations.

2.0 SCOPE

This instruction provides requirements for changing filter media of fixed air samplers, counting special air samples, calibrating airflow rates of airhead samplers, issuing required air sampling reports, and performing preventive maintenance of airhead samplers.

3.0 DEFINITIONS

3.1 Fixed air samplers consist of all airhead samplers and SAAMs used for room and effluent air monitoring.

3.2 Koval Factor (K) is a unit used in calculating air sample radioactivity which adjusts for the decay of short-lived radionuclides when sample counts are spaced in time. In calculations, K is used to designate the Koval Factor.

3.3 DAC is the acronym used to designate Derived Air Concentration. DAC values are specified (DOE Order 5480.11) for each radionuclide and their retention class, and are the limiting values for control of airborne radioactivity in the work place.

3.4 Airborne Radioactivity Area is the designated area posting required for areas where airborne radioactive material concentrations greater than 1/10 of the DAC are present.

3.5 Special air samples consist of any routine air samples having a survey instrument reading of more than 2500 cpm, or the filter from a positive SAAM alarm with 25 cpm or greater on a referee SAAM.

4.0 RESPONSIBILITIES

4.1 Manager(s) of personnel required to perform work per this instruction shall ensure that affected personnel are informed or trained to the extent necessary prior to initiation of that work.

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# *JCUSC VERIFICATION FORM*

Check One - ☑ Verified Complete ☐ Reopen

ISP # _____ JCUSC # 90-051 ORIGIN OF FINDING JCUSC

ACTION RESPONSIBILITY ASSIGNED TO: J. G. Quillin

STATEMENT OF FINDING:

Contaminated Air Samples counted in Bldg 123

EXPLANATION OF VERIFICATION:

1. Does the action plan address the intent of the resolution letter? Yes ✓ No ___

Compliance prior to July 1995 – Radiologically Controlled Areas established, daily contamination surveys were performed, and air samples going to 123 building were limited to 2,500 c/m.

Compliance after July 1995 – Area controlled by RWP requirement contamination surveys reduced to monthly (Rad Con – History used) and procedure rewritten that limits air samples to 500 d/m. Daily precautionary surveys are being performed on air sample carriers.

VERIFICATION BY UNION INVESTIGATOR D.L. McCoy (Print Name) (Signature) DATE 2/14/96

VERIFICATION BY COMPANY INVESTIGATOR W.D. STETSON (Print Name) (Signature) DATE 2/14/96

APPROVED BY UNION CO-CHAIR Ted Tegeler (Print Name) (Signature) DATE 2-15-96

APPROVED BY COMPANY CO-CHAIR R. L. Tietenberg (Print Name) (Signature) DATE 2/14/96

Distribution:

Performance Assurance - Commitments Tracking Group - T130G

Joint Company/Union Safety Committee - T452B / T690G

EG&G ROCKY FLATS

USWA

# JOINT COMPANY - UNION SAFETY COMMITTEE

February 11, 1994

TO: [redacted]
Rad With Labs
Building 123
Ext. [redacted]

FROM: E. I. Tietenberg / T. J. Tegeler
Joint Company/Union Safety Committee
Building T452B / Building T690G
Ext. 7620 / Ext. 5800

SUBJECT: REASSIGNMENT OF SAFETY CONCERN: 90-051
AIR SAMPLES

This letter is to inform you of the reassignment of the Company Representative for the above mentioned safety concern. The Union Investigator and the Company Investigator are listed below:

Company Representative: D. D. Melton Phone: 5130

Union Representative: D. L. McCoy Phone: 5298

KAISER HILL COMPANY

# JOINT COMPANY-UNION SAFETY COMMITTEE

UNITED STEELWORKERS OF AMERICA

February 15, 1996

TO: [redacted]
Rad HIth Labs
Building 123
Ext. 5568

FROM: E. I. Tietenberg / T. J. Tegeler
Joint Company/Union Safety Committee
Building T452B / Building T690G
Ext. 7620 / Ext. 5800

SUBJECT: VERIFICATION OF IMPLEMENTATION - SAFETY CONCERN NUMBER 90-051
AIR SAMPLES

The Joint Company/Union Safety Committee (JCUSC) has verified implementation of the subject safety concern and has closed the concern. Attached is the verification form.

Thank you for participating in the safety concern process.

Attachment:
As Stated

cc:
J. R. Cable
D. L. McCoy
D. D. Melton
J. G. Quillin
PATS

# *JCUSC VERIFICATION FORM*

Check One - ☑ Verified Complete ☐ Reopen

ISP # _____ JCUSC # 90-051 ORIGIN OF FINDING JCUSC

ACTION RESPONSIBILITY ASSIGNED TO: J. G. Quillin

STATEMENT OF FINDING:

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KAISER HILL COMPANY

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Rad Hlth Labs
Building 123
Ext. [redacted]

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Building T452B / Building T690G
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D. D. Melton
J. G. Quillin
PATS

# *JCUSC VERIFICATION FORM*

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ISP # _____ JCUSC # 90-051 ORIGIN OF FINDING JCUSC

ACTION RESPONSIBILITY ASSIGNED TO: J. G. Quillin

STATEMENT OF FINDING:

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