

DEPARTMENT OF HEALTH SERVICES  
RADIOLOGIC HEALTH BRANCH  
BOX 942732, MS-178  
SACRAMENTO, CA 94234-7320  
(916) 445-0931



## POLICY MEMORANDUM

Radiologic Health Branch

Policy No. RML-00-01

Effective Date of Policy: May 1, 2000  
Supersedes Policy No.: IPM-88-2 (with respect to *Large-Scale Decommissioning Projects*)

### OVERSIGHT OF LARGE-SCALE DECOMMISSIONING PROJECTS

#### 1.0 SCOPE

This memorandum describes the general policy applicable to *Large-Scale Decommissioning Projects*, as defined below, where the California Department of Health Services, Radiologic Health Branch (the Branch) has full or partial responsibility for overseeing the release of the facility undergoing decommissioning. This policy applies to licensed and unlicensed sites that meet the criteria of a *Large-Scale Decommissioning Project*.

#### 1.1 DEFINITIONS

The following shall apply in the context of *Large-Scale Decommissioning Projects*:

- 1.1.1 *Branch Decommissioning Team* shall mean a team composed of Branch staff members, with at least 1) one from the Licensing Unit responsible for the facility undergoing the decommissioning, 2) one from the Inspection, Compliance and Enforcement office responsible for the facility undergoing the decommissioning, and 3) one from the Radiological Assessment Unit.
- 1.1.2 *Confirmatory Survey* shall mean a survey performed by Branch staff to confirm the results of a facility's *Final Status Survey*. The survey shall confirm from 1 - 10% of the facility's measurements, including wipes, direct radiation measurements, soil samples, and other types of samples as appropriate.

**1.1.3** *Large-Scale Decommissioning Projects* shall mean those projects with one or more of the following characteristics:

- a) Multiple agency oversight - Facilities which are subject to regulatory oversight by the Branch *and* any other Local, State or Federal agency with respect to the possession, use or disposal of radioactive material.
- b) Large quantities of unsealed material - Facilities that use or have used large quantities of unsealed radioactive material. When evaluating the quantity of material used, one should consider not only the licensed possession limit, but also the annual throughput of material at the facility, and make a thorough review of the past history of use at the facility. The facility should be evaluated under this policy if they possess or possessed curie quantities of beta/gamma emitting material or millicurie quantities of alpha/neutron emitting material.
- c) Multiple use locations - Facilities that include multiple buildings or land areas where radioactive materials were used or could have been deposited (whether or not they are co-located at a single address).
- d) Public Interest - Facilities that, for whatever reason, have generated or appear likely to generate a substantial amount of public interest or media attention.
- e) Other - Facilities that do not meet any of the above criteria, but which the Branch determines should be subject to this policy.

**1.1.4** *Final Status Survey* shall mean the final survey performed by a facility in support of the release of an area for unrestricted use. The survey results must be submitted to the Branch in writing and include a written evaluation of the results. The document must demonstrate that the area meets the criteria for release defined in the facility's *Site Decommissioning Plan* and *Final Survey Plan* for the area in question (where one was submitted).

**1.1.5** *Final Survey Plan* shall mean a survey plan, which supplements the *Site Decommissioning Plan*, and describes the plan for surveying a subset of the facility discussed in the *Site Decommissioning Plan*.

**1.1.6** *Site Decommissioning Plan* shall mean a comprehensive written plan describing the characterization of the facility undergoing decommissioning, the projected remediation efforts, the criteria that will be used to demonstrate the site is releasable in accordance with applicable

regulations, and the methodology used to meet that criteria, including the procedures for the *Final Status Survey*.

## 2.0 AUTHORITY AND REFERENCE

The California Code of Regulations (CCR), title 17, Section 30256 requires that the final release of any site for unrestricted use be subject to the approval of the Branch.

## 3.0 POLICY


Where a facility requests, or is required, to decommission an area (currently or previously) contaminated with radioactive materials, the Branch shall make a determination as to whether or not the proposed decommissioning constitutes a *Large-Scale Decommissioning Project*, as defined in Section 1.1.2 of this policy. The determination shall be made by the licensing unit responsible for approving the ultimate release of the facility.

When making such a determination, the Branch staff shall consider 1) the guidance provided by the definition of a *Large-Scale Decommissioning Project*, 2) the size, complexity, and operational history of the facility, 3) the amounts and types of radioactive materials used, and 4) the potential effects on public health and safety related to decommissioning and eventual release of the facility for restricted or unrestricted use. A proposed decommissioning that meets the definition of a *Large-Scale Decommissioning Project* may still not be formally designated and treated as such if a determination is made that the decommissioning will proceed more effectively without such a designation, and that health and safety will not be compromised. Where the proposed decommissioning meets the definition of a *Large-Scale Decommissioning Project*, but it is determined that it should not be designated as such, a Supervising Health Physicist must approve that determination in writing, and the approval shall become a part of the Branch's file for that facility.

Once a decommissioning is designated a *Large-Scale Decommissioning Project*, the License Reviewer assigned to approve the ultimate release of the facility shall contact his or her supervisor, and request that a *Branch Decommissioning Team* be formed in accordance with the "Large-Scale Decommissioning Project Procedure," contained in the Inspection, Compliance and Enforcement Procedure Manual. The oversight of the project shall proceed in accordance with that procedure, and applicable policies, in particular, RML-00-02 and RML-00-03.

#### 4.0 DISCUSSION OF POLICY

The State of California has a number of facilities, both licensed and unlicensed, which are undergoing, or will undergo in the future, major decontamination and decommissioning. These facilities require that Branch staff work together closely to ensure the decontamination and decommissioning activities are carried out safely and in accordance with the regulations. In particular, some facilities are so large or complex that a structured team effort is required to provide the proper oversight by the Branch. This policy provides guidance as to when a structured team effort is appropriate.

  
Edgar D. Bailey, Chief  
Radiologic Health Branch