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CP3-RP-1601 **FRev. 2**	**TITLE**: Radiation Safety Training	Page 1 of 17

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REVISION/CHANGE LOG

Revision/Change Letter	Description of Changes	Pages Affected	Date of Revision/Change
FR0	Bluesheet	All	9/28/2017
FR1	Non-intent changes for bluesheet incorporation	All	12/18/2017
FR2	Update Appendix B, references and position titles, flowdown requirements from CP2-RP-0002, *Four Rivers Nuclear Partnership, LLC, Radiological Control Manual for the Paducah Gaseous Diffusion Plant, Paducah Kentucky,* and reorganize procedure.	All	2/20/2020

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1.0 PURPOSE AND SCOPE

1.1 Purpose

The procedure identifies the minimum radiation safety training requirements for entry into radiologically posted areas and for those individuals responsible for developing and implementing measures necessary for ensuring radiological health and safety compliance.

Driver: CP2-RP-0002, *Four Rivers Nuclear Partnership, LLC, Radiological Control Manual for the Paducah Gaseous Diffusion Plant, Paducah, Kentucky,* Chapter 6, Part 1 *Radiological Control Training and Qualification,* Chapter 6, Part 2 *General Employee Radiological Training,* Chapter 6, Part 3 *Radiological Worker Training* and Chapter 6, Part 5 *Other Radiological Training.*

1.2 Scope

This procedure applies to all Paducah Gaseous Diffusion Plant (PGDP) Deactivation & Remediation (D&R) contractor general employees and members of the public that require access into D&R radiologically posted areas and those D&R individuals responsible for developing and implementing measures necessary for ensuring radiological health and safety compliance.

The U.S. Department of Energy (DOE) has developed core radiation safety training materials providing information that is broadly applicable to all DOE activities, but does **NOT** address site specific information. These materials have been augmented with site-specific information which is applicable to work conducted by D&R contractor and its subcontractors and will be used to provide radiation safety training to employees. This procedure provides the guidance to determine the appropriate level of training necessary to meet applicable requirements.

The major types of radiation safety training in this procedure include:

- General Employee Radiological Training (GERT)
- Radiological Worker I (RWI)Training
- Radiological Worker II (RWII) Training
- Specialized Radiological Worker Training

The DOE has developed additional training courses which may be available for some job descriptions and specific conditions.

As specified by contract, the Infrastructure Support Services Contractor (ISSC) provides radiation safety training for D&R contractor as a government furnished service. This training includes Visitor, GERT, RW I and RW II training. The D&R contractor is responsible for review of the training content provided by the ISSC. GERT is included as part of the Portsmouth/Paducah Project Office (PPPO) General Employee Training (GET).

Visitor training combined with the use of a trained escort enable non-PGDP workers and members of the public who have **NOT** received GERT to enter Radiologically Controlled Areas (RCAs), Fixed Contamination Areas (FCAs), Soil Contamination Areas (SCAs), Underground Radioactive Material Areas (URMAs), Radioactive Material Areas (RMAs), Radiological Buffer Areas (RBAs), or Radiation Areas (RAs). Contamination Areas (CAs) may be entered with visitor training and a trained escort only with Radiological Control (RADCON) Management authorization.

Visitor training combined with the use of a trained escort enables PGDP workers who have **NOT** received GERT to enter RCAs or FCAs.

Retraining requirements: Radiation safety retraining is required to ensure workers remain qualified for the work they will be performing and the areas they will be entering. Individuals must complete RW I/II and GERT retraining within a 2 year time interval from the date of their initial site-specific training or last retraining. The retraining window must **NOT** exceed 24 months. [The Radiation Protection Manager (RPM) can extend this time interval for a period **NOT** to exceed 30 days to accommodate scheduling needs on a case-by-case basis.] **If** the RW I/II or GERT training is **NOT** completed within 24 months, **then** the worker loses qualification status and all associated access privileges. The worker must then successfully complete RWI/II or GERT training to regain qualification status.

This procedure does **NOT** apply to DOE prime contractors or others performing work at DOE facilities shared in common with the D&R Contractor when they are **NOT** working under work authorization or subcontract to the D&R contractor.

2.0 REFERENCES

2.1 Use References

- CP2-RP-0002*, Four Rivers Nuclear Partnership, LLC, Radiological Control Manual for the Paducah Gaseous Diffusion Plant, Paducah, Kentucky*
- CP3-RP-1109, *Radioactive Contamination Control and Monitoring*
- PPPO-AI-2184783 Revision 1, *PPPO Radiological and Hazardous Material Area Access Administrative Instruction for Visiting Minors*

2.2 Source References

CP2-TR-0100, *Training Program for the Paducah Gaseous Diffusion Plant Paducah, Kentucky*

3.0 COMMITMENTS

None

4.0 RESPONSIBILITIES

4.1 Manager or Supervisor

Ensures an individual receives appropriate radiation safety training before performing assigned duties.

4.2 Sponsor or Escort

Ensures that the member of the public they are escorting and/or sponsoring receives the appropriate radiation safety training or visitor training before they receive a badge.

4.3 Additional Responsibilities may be included in Section 6.0.

5.0 GENERAL INFORMATION

5.1 Radiation safety training shall include the following topics, to the extent appropriate to each individual's prior training, work assignments, and exposure to potential radiological hazards:

- Risks of exposure to radiation and radioactive materials, including prenatal radiation exposure.
- Basic radiological fundamentals and radiation protection concepts.
- Physical design features, administrative controls, limits, policies, procedures, alarms, and other measures implemented at the facility to manage doses and maintain doses As Low As Reasonably Achievable (ALARA), including both routine and emergency actions.
- Individual rights and responsibilities as related to implementation of the facility radiation protection program.
- Individual responsibilities for implementing ALARA measures.
- Individual exposure reports that may be requested by personnel.

5.2 Each individual shall demonstrate knowledge of the radiation safety topics established in Step **5.1**, commensurate with the hazards in the area and required controls, by successful completion of an examination and performance demonstrations:

- Prior to being permitted unescorted access to radiological areas
- Prior to performing unescorted assignments as a radiological worker

5.3 Each individual shall complete the applicable radiation safety training on the topics established in Step **5.1** commensurate with the hazards and required controls:

- Before being permitted unescorted access to controlled areas
- Before receiving occupational dose during access to controlled areas
- Before escorting individuals in controlled areas

5.4 Radiological Worker Training consists of three parts:

- Core academic (classroom or web-based) training
- Site-specific training
- Practical factors training

5.5 Radiological Worker Training is divided into two parts: RWI and RWII. Both parts are contained in the RW I/II core academics course and require completing the core academics and site-specific training. RWII includes the practical factors training for donning and doffing.

5.6 Radiological worker Core Academics (classroom or web-based) Training (RWI or RWII) **NOT** specific to a given site or facility may be waived provided that the following are met:

- The training has been received at another DOE site or facility within the past 24 months
- The training received was based on the DOE Core Radiological Worker Training material
- There is proof-of-training in the form of a certification document containing the individual's name, date of training, specific topics covered, the location where the training was provided, and an appropriate official has certified the training of the individual

5.7 Personnel that require Radiological Worker Training shall also complete the Radiological Worker Site Specific training provided by the ISSC.

5.8 Constant escort may be provided in lieu of certain types of training by making the escort responsible for the protection and actions of the affected individual. This approach should only be used when:

- The individual will enter the area for a short period of time (i.e., <40 hours)
- Relying on an escort will **NOT** result in significant adverse dose affects (ALARA considerations) and the resources, including collective dose that must be expended to escort personnel, are **NOT** excessive

5.9 **If** an escort is used in lieu of training, **then** the escort shall have completed the level of training required for the areas to be entered and the work to be performed and shall ensure the escorted individual complies with the radiation protection program. In addition, the untrained individual, if occupationally exposed in a radiologically controlled area at a DOE site or facility, shall complete at least those portions of the training related to the risks of exposure to radiation and radioactive materials, including prenatal radiation exposure and individual exposure reports that may be requested. In this situation, such training may be provided by the use of a brochure or poster.

5.10 There are situations where it may **NOT** be cost effective or necessary for all individuals to complete PPPO GET, such as pre-bid tour groups, visiting scientists, and vendors or truck drivers. In these situations, ensure the individuals are escorted after they read the Visitor Site Access Briefing, which is the minimum training required for escorted entry or before receiving occupational dose (i.e., >10 mrem/yr) in a radiologically controlled area. Visitor Site Access Briefing is provided by the ISSC.

5.11 All personnel shall complete the appropriate Radiological Worker Training in accordance with Appendix B, *Radiation Safety Training Matrix* before being allowed access to RCAs or performing work as a radiological worker.

5.12 In unique situations, workers **NOT** trained with RWI or RWII shall be allowed to perform "hands-on" work in Radiological Areas involving negligible or limited radiological hazards.

5.13 **When** workers are **NOT** trained with RWI/RWII **and** are requested to perform “hands-on” work in Radiological Areas, **then**:

- The work must be covered by a Radiological Work Permit (RWP) written specifically for the task and approved by the RPM
- The designated escort must be a Radiological Control Technician (RCT) and remain with the worker at all times while the worker is in the Radiological Area

5.14 Individuals may be restricted from entering Radiological Areas for medical therapy reasons [e.g., receiving diagnostic or therapeutic medical procedures involving radioisotope(s)].

5.15 Restrictions due to medical procedures are automatically imposed when a worker reports to work, following the procedure, and will be in effect until the calculated decay time has expired. Individuals must comply with bioassay requirements and receive RADCON Management approval to lift a restriction imposed for a delinquent bioassay appointment.

5.16 Individuals may be restricted from entering radiological areas for violating an RWP or RADCON program requirement, including the following:

- Failing to comply with required dosimetry requirements
- Committing procedural or RADCON violation(s) in the workplace

5.17 Per PPPO direction, access to PPPO area and facilities controlled as a radiological area is **NOT** permitted for minors under the age of 18 under any circumstance. Visiting minors may only be permitted into radiologically controlled access areas when approved by the PPPO Health Physicist, the appropriate Site Lead, and the PPPO Manager, Deputy Manager, or Designee. Visiting minors must be accompanied by, and under the supervision of, a parent, legal guardian or chaperone. In addition, a Parental Consent for Minors Visiting PPPO form must be completed for each visiting minor. This policy is **NOT** applicable to workers, who are under the age of 18, including the U.S. DOE contractors and their subcontractors and persons working under DOE grants. See PPPO-AI-2184783 Revision 1, *PPPO Radiological and Hazardous Material Area Access Administrative Instruction for Visiting Minors*, for further details.

5.18 Training requirements are based on job descriptions and the types of areas the individual requires access into to perform their assigned duties. Employment status (e.g., permanent, contractor, temporary) should **NOT** be used to determine the appropriate level of training. Training may be adjusted to be commensurate with the individual's level of access, assigned duties, and previous training and experience.

5.19 The following factors should be considered to determine the appropriate level of knowledge and training the individual requires:

- The individual's status (i.e., general employee or member of the public).
- The nature of the radiological hazards in the area(s) the individual will be entering.
- The nature of the work to be performed.
- The type and complexity of protective actions the individual might be expected to execute in both routine and emergency conditions.
- A determination as to whether or **NOT** the individual will be under continuous escort or supervision.
- The individual's previous education, training, and experience in working with radioactive materials and exposure to potential radiological hazards.

5.20 The following sections may be referred to, to determine criteria to determine radiation safety training requirements, as applicable:

- Section **6.1** Training Requirements for Unescorted General Employees
- Section **6.2** Training Requirements for Escorted General Employees
- Section **6.3** Training Requirements for Members of the Public

- Section **6.4** Evaluating the Adequacy of the Individual's Current Training
- Section **6.5** Specialized Radiological Worker Training
- Section **6.6** Escort Responsibilities
- Section **6.7** Radiological Worker Restrictions

5.21 Individuals responsible for developing and implementing measures necessary for ensuring radiological health and safety compliance shall have the appropriate education, training, and skills to discharge these responsibilities as presented in CP2-RP-0002. At a minimum, this includes those individuals filling the following roles:

- Radiological Control Technicians
- Radiological Control Supervisors
- Radiological Engineers
- RADCON Senior Staff and Management
- RADCON Support Personnel
- Technical Support Personnel
- Planners
- Line managers
- Radiographers and Radiation Generating Device Operators
- Emergency Response Personnel

6.0 INSTRUCTIONS

NOTE:

General employees shall receive radiation safety training before performing assigned duties that are expected to result in occupational radiation exposure. Usually, general employees receive the level of training required to gain unescorted access to their work areas. However, as described in Section **6.2**, a general employee without the training to gain unescorted access may be escorted into a posted area by an individual trained to enter the area. Appendix B identifies the minimum training that is required to gain unescorted access to the various areas posted for radiological purposes.

6.1 Training Requirements for Unescorted General Employees

<u>Front Line Manager</u>

6.1.1 Verify the employee has successfully completed GERT within the last two years.

NOTE:

Emergency response personnel should receive special radiological worker training commensurate with the situations they are likely to encounter. Any individual assigned to perform emergency actions that may result in a dose exceeding the occupational dose limits shall receive Radiological Worker or equivalent training.

6.1.2 Review the general employee's job classification and assigned duties.

6.1.3 Identify the types of posted areas into which the general employee must gain unescorted access to complete their assigned duties.

6.1.4 Review the minimum training requirements specified in Appendix B and identify the highest level of training the general employee requires for unescorted access into posted areas where they are assigned to work.

6.1.5 Ensure the general employee successfully completes the required training prior to performing assigned duties.

6.2 Training Requirements for Escorted General Employees

NOTE:

Access to posted area with an escort is described in Appendix B. Occasionally, it may be necessary for a general employee to gain temporary access into radiological areas for which they have **NOT** been trained for unescorted access.

Front Line Manager

NOTE:

If a general employee requires frequent access into a specific radiological area, **then** they should complete radiological worker training, as specified in Section **6.1**, to gain unescorted access.

6.2.1 Verify that the general employee has received visitor site access briefing or has successfully completed GERT and that the training has **NOT** expired.

6.2.2 Review the general employee's job classification and assigned duties.

6.2.3 Identify the types of posted areas into which the general employee must gain escort access to complete their assigned duties.

6.2.4 Review the minimum training requirements specified in Appendix B **and** determine if the employee can gain escorted access into the posted area with only visitor site access briefing.

6.2.5 **If** the employee can gain escorted access into the area with visitor site access briefing, **then** ensure the employee is escorted by an employee that meets the training requirements for unescorted access, as specified in Appendix B.

6.2.6 **If** the employee can **NOT** gain escorted access into the area with GERT, **then** perform training as specified in Section **6.1**.

NOTE:

- **If** an individual receives occupational exposure to radiation **and/or** radioactive material as a result of the individual's work assignment, **then** the individual would be considered a general employee and would be subject to the provisions in Section **6.1** or **6.2**. Members of the public are **NOT** allowed access into areas where there is a potential to exceed 100 mrem per year total effective dose.
- Access requirements are shown in Appendix B for members of the public.

6.3 Training Requirements for Members of the Public

Sponsors

6.3.1 Identify the type(s) of posted area(s) into which the member of the public requires access.

6.3.2 Review training requirements in Appendix B and verify that members of the public can enter the areas identified in Step **6.3.1**.

6.3.3 Determine if the member of the public will be escorted or unescorted and perform the following:

- **If** the member of the public will escorted, **then** proceed to Step **6.3.4**.
- **If** the member of the public will **NOT** be escorted, **then** proceed to Step **6.3.6**.

6.3.4 Review the minimum training requirements specified in Appendix B **and** identify the highest level of training that the member of the public requires for escorted access into the posted area.

6.3.5 Verify the member of the public will be continuously escorted by an employee that meets the training requirements for unescorted access, as specified in Appendix B.

6.3.6 **If** the member of the public will **NOT** be escorted at all times, **then** perform the following:

- Obtain prior approval from the RPM
- Verify the member of the public has completed GERT and will only enter an RCA.
- Establish appropriate limitation for the areas to be entered and for the planned activities.

NOTE:

The D&R contractor recognizes training received at other DOE sites within the past two years. The successful completion of the entire core academic components of the DOE standardized courses for RWI and RWII training at other sites meet applicable training requirements. Allowances may also be made for individuals who have successfully completed other types of radiological training within the past two years. In addition, consideration may be given for completion of training from other (non-DOE) nuclear facilities, formal education applicable to radiation safety, and previous work experience at facilities with similar hazards and controls. All individuals, regardless of previous education, training and skills must complete an examination and performance demonstration before being permitted unescorted access to radiological areas and before performing unescorted assignments as a radiological worker. Because GERT is a very short module and contains site-specific PGDP information, the D&R contractor does **NOT** give credit for GERT taken at other DOE sites except for Portsmouth since both sites are addressed in PPPO GET.

6.4 Evaluating the Adequacy of the Individual's Current Training

Front Line Manager

NOTE:

Section **1.2** may be referred to for training requirements.

6.4.1 Check the training records to determine the individual's current level of radiation safety training and expiration date of training.

6.4.2 Compare the individual's current training to the required training identified in Section **6.1** or **6.2**.

6.4.3 Adhere to the following:

- **If** the individual has received the required level of Radiation Worker Training and the training has **NOT** yet expired, **then** the individual is qualified to perform radiological work, and is allowed to enter areas posted for radiological purposes according to the individual's level of training.
- **If** the individual currently does **NOT** have the required DOE radiation safety training, **then** the individual must receive the required training identified in Section **6.1** or **6.2** before they perform assigned duties.
- Employees are **NOT** qualified radiological workers once their retraining date is lapsed and they can **NOT** perform work in a radiological area.

NOTE:

In addition to the general radiation safety training courses, Specialized Radiological Worker Training may be required to enable a general employee to safely and effectively complete their assigned duties.

6.5 Specialized Radiological Worker Training

Front Line Manager

6.5.1 Review the general employee's job assignment.

6.5.2 Consult with the training coordinator and determine if the general employee should receive any specialized training courses.

6.5.3 Ensure the general employee receives specialized training, as necessary, before performing assigned duties.

NOTE:

- This section outlines the responsibilities of personnel who act as escorts. Adherence to this section will help ensure that personnel are being escorted properly and minimize problems that can occur when escorted personnel are taken into D&R contractor operated areas.
- To serve as an escort, personnel must have the required level of training for unescorted entry into the area to be entered.
- The practice of escorting general employees into radiological areas should be minimized and limited to infrequent and short visits (e.g., less than four hours). General employees should receive the appropriate level of training for unescorted access when the assigned task is of long duration, requires repeated entry, or involves radiological work (e.g., touching or handling of radioactive materials).
- General employees may receive occupational dose while performing escorted tasks for D&R activities. However, general employees who routinely receive occupational dose should receive the appropriate training to gain unescorted access.

6.6 Escort Responsibilities

Escort

6.6.1 Escort Responsibilities Before Entering the Area

A. Identify the area(s) to be entered as an escort.

B. Determine if the personnel being escorted are members of the public or general employees.

C. **If** personnel being escorted are minors, **then** see Step **5.17 and** contact RADCON Management.

D. Determine the training level that is required to enter the area (see Appendix B) and verify that the personnel being escorted have the appropriate training.

E. **If** any of the personnel to be escorted need additional training, **then** notify D&R Training.

F. Identify the number of personnel who will require escorts.

G. Brief the escorted individual(s) on the area(s) that will be entered.

H. Remind personnel to stay with you and follow your directions and instructions.

I. **If** individuals need dosimetry for the areas to be entered, **then** verify that escorted individuals have been issued dosimetry.

6.6.2 Escort Responsibilities While in the Escorted Area

A. Watch escorted personnel to ensure they do **NOT** exhibit "inappropriate" behavior for the area (e.g., reaching across boundaries, wandering away from the group, etc.).

B. Respond appropriately to any emergency warnings or alarms.

C. **When** escorting is completed, **then** ensure all personnel have exited the area.

6.7 Radiological Worker Restrictions

Radiological Worker

6.7.1 Notify supervision or designated dosimetry point of contact **and** contact site Dosimetry Office, prior to receiving a diagnostic or therapeutic medical procedure involving radioisotopes.

RADCON Management

6.7.2 Confiscate the radiological worker's dosimeter and calculate time before restriction can be lifted.

6.7.3 Provide notification of the length of restriction and when the restriction can be lifted to the following personnel, as necessary:

- Radiological worker
- Project manager
- Supervisor, or designated dosimetry point of contact

Radiological Worker

6.7.4 **If** restricted for other reasons **then** comply with the appropriate compensatory measures (e.g., completion of re-qualification examination or practical factors training) **and** receive RADCON Management approval before the restriction is lifted.

RADCON Management

6.7.5 **If** restricted personnel re-qualification is satisfactory, **then** approve restricted personnel return to duty.

6.7.6 **If** notified that an individual has committed a significant RADCON program or RWP violation, **then** restrict the individual from entering or performing work in a Radiological Area.

6.7.7 Notify the employee's supervisor of the decision to restrict the individual **and** provide guidelines for compensatory actions necessary to lift the restriction.

6.7.8 Lift restriction after compensatory actions have been completed.

7.0 RECORDS

7.1 Records Generated

The following records may be generated by this procedure:

None

Forms are to be completed in accordance with CP3-OP-0024, *Forms Control*.

7.2 Records Disposition

The records are to be maintained in accordance with CP3-RP-1401, *Radiation Protection Program Records,* and CP3-RD-0010, *Records Management Process.*

Appendix A – Acronyms/Definitions

ACRONYMS

ALARA – As Low As Reasonably Achievable

ARA – Airborne Radioactivity Area

CA – Contamination Area

DOE – U.S. Department of Energy

D&R – Deactivation & Remediation

FCA – Fixed Contamination Area

GET – General Employee Training

GERT – General Employee Radiological Training

HCA – High Contamination Area

HRA –High Radiation Area

ISSC – Infrastructure Support Services Contractor

PGDP – Paducah Gaseous Diffusion Plant

PPPO – Portsmouth/Paducah Project Office

RA – Radiation Area

RADCON – Radiological Control

RBA – Radiological Buffer Area

RCA – Radiologically Controlled Area

RMA – Radioactive Material Area

RPM – Radiation Protection Manager

RWI – Radiological Worker I

RWII – Radiological Worker II

RWP – Radiological Work Permit

SCA – Soil Contamination Area

URMA – Underground Radioactive Material Area

VHRA – Very High Radiation Area

Appendix A – Acronyms/Definitions (Continued)

DEFINITIONS

Refer to CP2-RP-0002, *Four Rivers Nuclear Partnership, LLC, Radiological Control Manual for the Paducah Gaseous Diffusion Plant, Paducah, Kentucky*

Appendix B – Radiation Safety Training Matrix

Minimum Training Requirements for Access Into Areas Posted for Radiological Purposes

Radiological Posting or Activity	Unescorted Access	Escorted (Member of Public and Non-PGDP Workers)	Escorted (PGDP Workers)
Radiologically Controlled Areas (RCAs), Radioactive Material Areas (RMAs), Underground Radioactive Material Area (URMAs), and Fixed Contamination Area (FCAs) where an individual is **NOT** likely to receive 0.1 rem in a year.	GERT[1,2]	Visitor Site Access Briefing[3]	Visitor Site Access Briefing
Radioactive Material Area (RMA) or Underground Radioactive Material Area (URMA) entry where an individual **is** likely to receive>0.1 rem in a year.	RWI[4]	Visitor Site Access Briefing[3]	GERT[2]
Soil Contamination Area (SCA) that does **NOT** disturb the soil.	GERT[2]	Visitor Site Access Briefing[3]	GERT[2]
Soil Contamination Area (SCA) that disturbs the soil.	RWII	Visitor Site Access Briefing[3,5]	GERT[2,5]
Radiological Buffer Area (RBA) (for contamination or radiation)	RWI[4]	Visitor Site Access Briefing[3]	GERT[2]
Radiation Area (RA)	RWI[4]	Visitor Site Access Briefing[3]	GERT[2]
High Radiation Area (HRA)	RWII	RWII	RWII
Very High Radiation Area (VHRA)	RWII	RWII	RWII
Contamination Area (CA)	RWII	Visitor Site Access Briefing[3,5]	GERT[2,5]
High Contamination Area (HCA)[5]	RWII	RWII	RWII
Airborne Radioactivity Area (ARA)	RWII	RWII	RWII
Use of containment devices with high internal contamination levels[6]	RWII	RWII	RWII

[1] Unescorted access is allowed in Radiologically Controlled Areas for members of the public if personnel receive GERT, have approval from the Radiation Protection Manager, and appropriate limitations (if necessary) are established.

[2] GERT is included as part of the Portsmouth/Paducah Project Office (PPPO) General Employee Training (GET).

[3] Visitor Site Access Briefing shall have enough detail to address the regulatory requirements of CP2-RP-0002 Article 622. GERT (General Employee Radiological Training) contains the information presented in Visitor Site Access Briefing and satisfies requirements for Visitor Site Access Briefing.

[4] RWI training is does **NOT** qualify individuals to perform intrusive work such as opening containers having potential for loose radioactive material/contamination. Individuals with RWI training who have **NOT** been trained for instrumentation monitoring must have an RCT monitor the individual.

[5] Radiation Protection Manager must authorize access on a case-by-case basis.

[6] Includes glove boxes and other containment devices with internal surface contamination levels exceeding 100 times CP3-RP-1109, *Radioactive Contamination Control and Monitoring,* Appendix B values.