Meeting Date: June 19-22, 2006
Date Prepared: June 22, 2006

MULTI-AGENCY RADIATION SURVEY AND SITE INVESTIGATION MANUAL (MARSSIM) WORKGROUP MEETING NOTES - DRAFT

MONDAY, JUNE 19, 2006

ATTENDEES:

U.S. Environmental Protection Agency – OERR/ERT: C. Petullo
U.S. Environmental Protection Agency – ORIA/HQ: K. Snead
U.S. Environmental Protection Agency – Region 2: N. Azzam (by phone)
U.S. Nuclear Regulatory Commission – RES: G. Powers
U.S. Department of Energy: A. Williams
U.S. Department of Defense - Army: D. Alberth
U.S. Department of Defense - Navy: S. Doremus

DISCUSSION:

Introduction, Agenda, and Objectives

There will be no contractor support for this meeting, due to a lapse in funding. C. Petullo will follow contracting concerns with the Air Force more actively in the future to ensure that lapses of funding will not reoccur. K. Snead will take down meeting minutes and publish them for this meeting.

Agency Updates

Environmental Protection Agency (EPA) – K. Snead reports that a selection has been made for the position of Radiation Protection Division Director; however, the candidate has not been confirmed or announced. It is expected that this announcement will be made in the near future. Bonnie Gitlin, who has been acting as Division Director for the last two years will go back to her original position as Deputy Division Director. It is expected that the Division will be reorganized after the new Division Director has gotten settled. It is unknown how this may affect MARSAME in the future. C. Petullo reports that the other Health Physicist in her group, Ellery Savage, has left his position, and the group is not bale to replace him at this time. As a result, she is being relied upon to perform some of his duties, making her very busy at this time.

Department of Defense/Army – D. Alberth reports that three commenters participated in the Internal Agency Review of MARSAME, two from the medical side, and one from the U.S. Army Corps of Engineers. The previous Army POC, Dennis Chambers, has retired from the Army to take on a Contractor position. D. Alberth and S. Doremus are working collaboratively on finding a signatory for the Department of Defense. It is hoped that

having the Army Radiation Safety Officer and other individuals lending support to the document will facilitate this process.

Department of Energy (DOE) – A. Williams reports that he received a number of comments from various groups within DOE on the Internal Agency Review draft of MARSAME. One ongoing concern for his Agency is the Government Accounting Office (GAO) report on the Rocky Flats cleanup. A. Williams reports that comments related to MARSSIM policy are included in the investigation; he is looking to get copies of both the EPA and DOE letters on the topic to share with the workgroup.

Nuclear Regulatory Commission (NRC) – G. Powers reports that he will replace Robert Meck as the Nuclear Regulatory (NRC) Point-of-Contract (POC) beginning with the current meeting due to some reorganization of duties occurring at the NRC.

Department of Defense/Air Force – R. Bhat does not expect to be available to attend the meeting this week, and sent comments in e-mails to all workgroup members prior to the meeting.

Department of Defense/Navy – S. Doremus reports that he received no official comments from reviewers of the Internal Agency Review draft of MARSAME; however, he received some informal (verbal) comments on the document.

Administrative Issues

A. Williams gave the last presentation at the ISCORS meeting in June. S. Doremus will give the next presentation, if he is available on that date. If he is not available, D. Alberth will take his place. The next meeting of ISCORS is scheduled for sometime in the August/September timeframe at the NRC Auditorium, and will be open to the public. As per requests at the last two ISCORS meetings, Internal Agency Review drafts of MARSAME have been provided to representatives from the Department of Transportation and the Department of Homeland Security. No comments have been provided to the workgroup from either of those Agencies.

Comment Resolution

See attached spreadsheet for comments on Chapter 0, Line 1 to Chapter 1, Line 429.

Meeting Date: June 19-22, 2006
Date Prepared: June 22, 2006

MULTI-AGENCY RADIATION SURVEY AND SITE INVESTIGATION MANUAL (MARSSIM) WORKGROUP MEETING NOTES - DRAFT

TUESDAY, JUNE 20, 2006

ATTENDEES:

U.S. Environmental Protection Agency – OERR/ERT: C. Petullo
U.S. Environmental Protection Agency – ORIA/HQ: K. Snead
U.S. Environmental Protection Agency – Region 2: N. Azzam (by phone)
U.S. Nuclear Regulatory Commission – RES: G. Powers
U.S. Department of Energy: A. Williams
U.S. Department of Defense - Army: D. Alberth
U.S. Department of Defense - Navy: S. Doremus
U.S. Department of Defense - Air Force: R. Bhat

DISCUSSION:

Comment Resolution

See attached spreadsheet for comments on Chapter 2, Line 12 to Chapter 3, Line 364.

Meeting Date: June 19-22, 2006
Date Prepared: June 22, 2006

MULTI-AGENCY RADIATION SURVEY AND SITE INVESTIGATION MANUAL (MARSSIM)
WORKGROUP MEETING NOTES - DRAFT

WEDNESDAY, JUNE 21, 2006

ATTENDEES:

U.S. Environmental Protection Agency – OERR/ERT: C. Petullo
U.S. Environmental Protection Agency – ORIA/HQ: K. Snead
U.S. Environmental Protection Agency – Region 2: N. Azzam (by phone)
U.S. Nuclear Regulatory Commission – RES: G. Powers
U.S. Department of Energy: A. Williams
U.S. Department of Defense - Army: D. Alberth
U.S. Department of Defense - Navy: S. Doremus

DISCUSSION:

Comment Resolution

See attached spreadsheet for comments on Chapter 4, Line 1 to Chapter 14 (Glossary), Line 94.

Meeting Date: June 19-22, 2006
Date Prepared: June 22, 2006

MULTI-AGENCY RADIATION SURVEY AND SITE INVESTIGATION MANUAL (MARSSIM)
WORKGROUP MEETING NOTES - DRAFT

THURSDAY, JUNE 22, 2006

ATTENDEES:

U.S. Environmental Protection Agency – OERR/ERT: C. Petullo
U.S. Environmental Protection Agency – ORIA/HQ: K. Snead
U.S. Nuclear Regulatory Commission – RES: G. Powers
U.S. Department of Energy: A. Williams
U.S. Department of Defense - Army: D. Alberth
U.S. Department of Defense - Navy: S. Doremus

DISCUSSION:

Comment Resolution

Parking Lot Concerns for the Meeting:

I. Technical Editing Needs (Chapter 0, Line 1) – The Workgroup will consider whether funding is available to fund a complete technical edit of the document.
II. Implementation Help (Chapter 0, Line 1; Chapter 1, Line 1; AF Page 4 of 5, #1) – Cabrerra Services (hereafter referred to as "the contractor") will develop a "Roadmap" section for the beginning of the document. In addition, the contractor will develop flow charts for Chapters 5 and 6, and develop a combined flow chart linking all of the flow charts for all of the Chapters. In addition, G. Powers will develop a Process/Data Flow chart for MARSAME, and bring it to the next meeting for discussion and possible inclusion.
III. User Friendliness (Chapter 0, Line1; Chapter 1, Line 1) – K. Snead will check with the EPA Center for Radiation Information to see if she can obtain assistance in developing a concise summary of the document in plain English. A. Williams will attempt to write a case study example in plain English. Both will be brought to the next meeting for discussion and possible inclusion.
IV. Possible Risk- or Dose-Based Example (Chapter 1, Line 62) – The workgroup discussed the possibility and agrees that an example would be useful; however they decided that it is not feasible in the time available considering the other comments that must be addressed. **COMPLETE**
V. Graded Approach Discussion (Chapter 1, Line 155) – The contractor will include the term "graded approach" in the Glossary. N. Azzam forwarded material on "graded approach" to the workgroup for discussion.

VI. Preliminary Classification during the Initial Assessment (Chapter 2, Line 148) – The contractor will add a new paragraph to cover the material in the comment will be added in Chapter 4, after line 329. Similar text to the text included in the comment from "The improper…" to "to be released" will be included, as well as text on the danger of misclassifying in the other direction. **COMPLETE**

VII. Section 2.3 Organization (Chapter 2, Line 280) – The contractor will revise the section to follow this order: "Section 2.3 Describe the M&E" and "Section 2.4 Design and Implement Preliminary Surveys if Necessary", with the remaining sections re-numbered. **COMPLETE**

VIII. Possible New Section 2.6 on Developing SOPs Using MARSAME (Chapter 2, Line 238) – The contractor will add a paragraph to Section 2.2.5 to discuss the possibility of using an existing SOP, with the need to complete the steps in Chapter 2 and consult Section 3.10 for more guidance on the topic. Include the general idea of the comment from "Collectively…" to "…diverse properties." **COMPLETE**

IX. What to do if there is no survey possible? (Chapter 2, Line 341) – The contractor will add the following text to the end of Section 4.1, "However, there may be cases where an adequate survey design cannot be developed due to decisions made earlier in the planning process. In these cases, it may be necessary to revisit some of those decisions, for example, the choice of disposition option or the cost-benefit analysis." **COMPLETE**

X. Survey Unit Boundaries and Switching Sections 3.6 and 3.7 (Chapter 3, Lines 431 and 434) – C. Petullo will evaluate and report back to the Workgroup.

XI. Scenario B Discrimination Limit Examples (Chapter 4, Line 137) – Workgroup wishes to discuss this comment with the contractor.

XII. Citation for Regulatory Guide 1.86 – The Workgroup will assess whether MARSAME can mention State Regulations and the ANSI N13.12 standard in place of Regulatory Guide 1.86. A. Williams and G. Powers will perform further research on Regulatory Guide 1.86. K. Snead will assess possibility of citing ANSI N13.12 and State Regulations.

XIII. Compare Section 6.9 and Section 4.5 (Chapter 4, Line 629) – The comment text is not applicable for Section 4.5, but the Workgroup feels that some of the comment text (final disposition and QA/QC measurements) can be included as "For example…" text in Section 6.9. **COMPLETE**

XIV. Chapter 5 Content Concerns – The Workgroup will review and comment on Section 5.5 to the end of the Chapter by the next meeting.

XV. Implementation Software (AF Page 3 of 5, #7) – The Workgroup would like to defer developing software until the final document has been completed.

XVI. Maximum of the Upper Bound of the Grey Region (Chapter 6, Line 394) – The Workgroup wishes to discuss this comment with the contractor.

XVII. Consolidated List of Symbols (AF Page 1 of 5, #1) – S. Doremus will bring this list to the next meeting for discussion and possible inclusion.

XVIII. Example of an SOP developed using the guidance in Chapters 1 – 6. The workgroup discussed the possibility and agrees that an example would be useful; however they decided that it is not feasible in the time available considering the other comments that must be addressed. **COMPLETE**

XIX. Clearance (Chapter 7, Line 251) – The Workgroup disagrees. The term has been accepted for use by all agencies and is appropriate for the example at hand. **COMPELTE**

XX. Stapleton Equation (Chapter 7, Line 1245) – The Workgroup would like to address this comment after they have completed their in-depth review of Chapter 5.

XXI. RDR and FRER (Chapter 7, Line 1479) – The Workgroup would like to address this comment after they have completed their in-depth review of Chapter 5.

XXII. Different editions of the Health Physics Handbook Referenced (References, Line 90) – The Workgroup wishes to discuss this comment with the contractor.

XXIII. Energy Policy Act (AF Page 3 of 5, #5) – The Workgroup disagrees. The text in Appendix B, Line 163 already takes into account the Energy Policy Act, and is still valid. **COMPLETE**

The next meeting will be held at 1310 L Street, Washington, D.C., in Conference Room 502, from July 31, 2006 to August 4, 2006.

Action Items

All

- Read and review Chapter 5.5 to the end of the Chapter. Bring comments to the next meeting

A. Williams

- Forward contact information to EPA on the DoD Officer to the EPA by next meeting
- Develop Case Study Example in plain English by next meeting
- Develop historical perspective piece on Regulatory Guide 1.86 by next meeting
- Provide website addresses for references in Appendix E.

C. Petullo

- Call Fred Ferate, Department of Transportation
- Read Section 3.6 and 3.7 to determine if change is needed by next meeting
- Decide where to insert Survey Unit Boundaries in text (Section 3.4.3.1) by next meeting

G. Powers

- Look up the ADAMS Number for Regulatory Guide 1.86 by next meeting
- Develop process/data flow chart for Workgroup and bring it to the next meeting

K. Snead

- Determine if it is acceptable to cite ANSI N13.12 or State Regulations in MARSAME for EPA by next meeting
- Develop plain English summary of the document and bring it to the next meeting
- Draft up meeting notes and forward them to the Workgroup
- Schedule meeting room for next meeting, with additional meeting rooms scheduled for Monday afternoon of the meeting for some reading time

S. Doremus

- Develop consolidated list of symbology and bring it to the next meeting
- Find FR Notice on Regulatory Guide 1.86
- Develop ISCORS Presentation for next ISCORS meeting

Contractors

- Address completed comments in the attached spreadsheet
- In chapter 4, on line 198, add “(Chapter 3)” after “Step 5 of the DQO Process”
- Add the following terms to the glossary: graded approach, spectronomy, spectroscopy, concentration, alternative action, data life cycle, degrees of freedom, preliminary survey, radionuclides or radiations of concern, radionuclides or radiations of potential concern, release survey, restricted releases, reuse, recycle, unrestricted release, standardized IA.
- Perform a global change of “spotty” and “patchy” to “non-uniform”
- Send formatting for List of Abbreviations to S. Doremus
- Develop the SOP for use in Section 7.2