

Radiation-Generating Device (RGD) Program Exemptions

Reasons for Exemptions

If the design of the facility cannot be upgraded in a practical manner to meet the 10 CFR 835 criteria, as specified in the BNL Radiological Control Manual (RCM) and site procedures, then the alternative is the implementation of additional access and occupancy controls to meet the design.

ANSI N43.2 and N43.3 provide specific guidance that should be considered for exempt shielded (including cabinet x-ray), shielded, unattended, and open installations. Should any conflict exist between the requirements and guidance provided in these standards and the requirements of the Brookhaven National Laboratory (BNL) Radiological Control Program and site procedures, then the requirements of the BNL Radiological Control Program and site procedures take precedence.

Requests for exemption will be considered on a case-by-case basis. If the request is granted, the requester will be advised, in writing, by the Radiological Control Division (RCD) Manager, that the device has been exempted from all but the following requirements of the RGD Program:

- Registration in the RGD or sealed source database for tracking purposes.
- Labeling.
- Notification of the Master RGD Custodian regarding changes in use, transfer, storage, disposal, or loss of an RGD.

Requests For Exemptions

The owner of the device submits an exemption request for RGD program exemption to the RCD Manager. In addition, the request includes the following:

- The area, building, or operation involved.
- Specific standard or requirement that makes the exemption necessary.
- A description of the condition, process, or activity that needs an exemption.
- Measures in place to provide adequate protection and to reduce the risk to an acceptable level, or the reason that equivalent measures are not required.
- The reason that the requirement is not applicable or that it may, in fact, decrease safety.
- A cost-benefit analysis, if appropriate.
- A statement of whether the hazard mitigation is equivalent and, if not, a qualitative assessment of the residual risk.

Examples

The following devices may be exempt from classification as an RGD:

- Devices for which a documented analysis shows that the worst-case accident would result in a deep dose to the whole body of no more than 10 mrem, a dose to the lens of the eye of no more than 30 mrem, and a dose to the skin or any extremity of no more than 100 mrem.