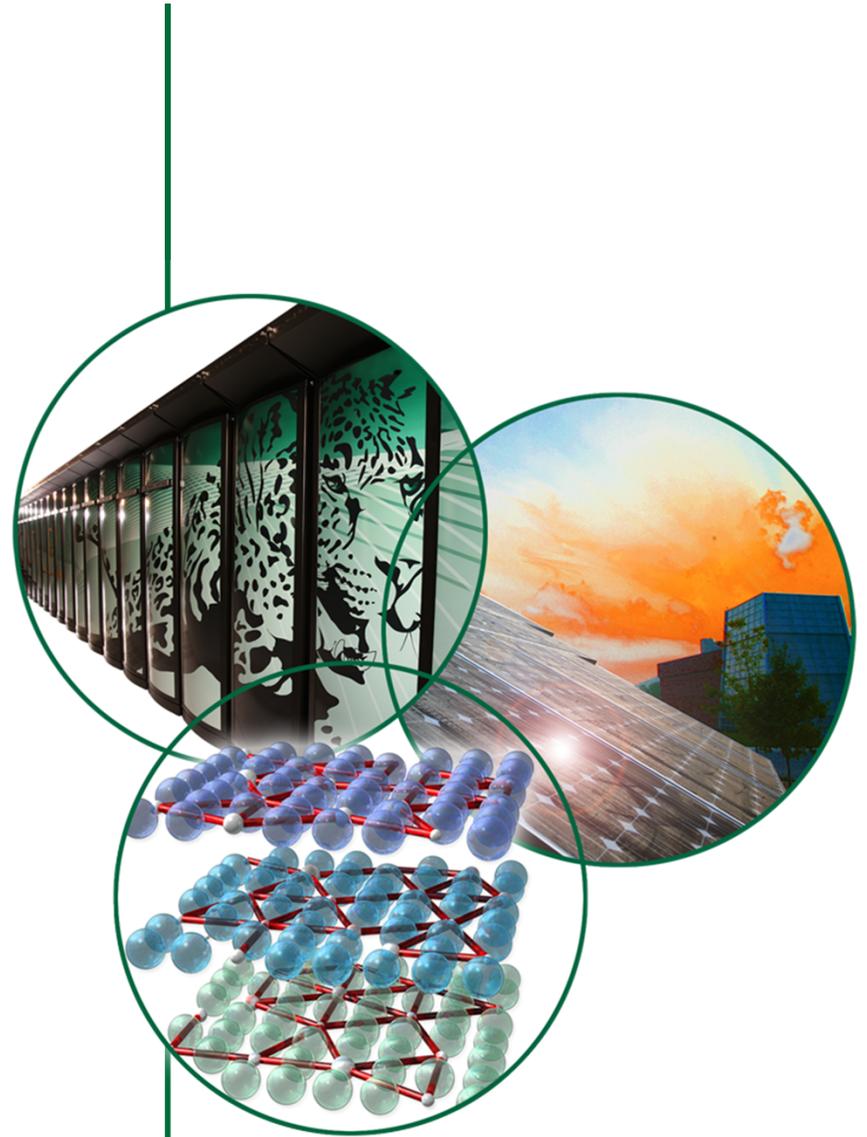


SC White Paper on "Accessibility" at Accelerator Facilities

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Are Protected Enclosures “Accessible” During Beam Operations?

- Most SC accelerator sites assume areas protected by credited systems are inaccessible; radiological postings reflect beam-off conditions.
 - Radiological Areas are defined only when “accessible to individuals”
- HSS drafted a Finding during a site visit to TJNAF concluding that all enclosures with doorways are “accessible” at all times; GC began drafting a supporting opinion.
- The HSS interpretation would require SC accelerators to implement conditional postings, automated postings, or frequent re-postings.

DOE Guidance

- The Guide supporting 10 CFR 835 discusses accessibility (DOE G 441.1-1C, sec. 12.2.4)
 - Areas with doorways are considered accessible
 - Areas requiring the use of tools or equipment for entry are inaccessible
- The Accelerator Order Guide (420.2-1) states that a fully enclosed and interlocked area is inaccessible
- Other DOE accelerator-related guidance supports the SC position

Impact of Considering Beam Areas to be Accessible at All Times

- SC Accelerator beam areas have up to 50 entrances – manual re-posting for beam on/off status is inefficient and operationally unacceptable.
- Implementation of automated posting systems at SC sites will take at least a year, cost at least \$2M, and require annual maintenance.
- The change would increase Human Performance risk with no increase in safety.

SC “White Paper” on Accessibility Submitted to DOE Mgmt

- Briefly, the SC position is that accelerator areas protected by credited safety systems are inaccessible.
- The SC position is consistent with specific DOE guidance and is safe, effective, and efficient. The HSS position is consistent with more general guidance, but is not as safe, effective, or efficient.
- Status: The matter still has no clear resolution; SC accelerators will continue to implement current policy for the present.