2.22.23

## RADIATION SAFETY TRAINING **PROGRAM**

WE RADIATE SAFETY.

## INTRODUCTION Handling and use of portable nuclear gauges are restricted to

trained personnel. A portable gauge operator will be an Authorized User. An Authorized User is an individual that has completed an approved formal radiation safety class and is specifically listed on a radioactive material license.

There are three training components associated with portable

gauges. Authorized User Training will be provided to employee-

owners who will be independently using the gauges. Hazardous Materials (Hazmat) Employee Training will be provided to any employee-owner associated with the packaging and transportation of gauges. Ancillary Personnel Radiation Awareness Training will be provided to all personnel who may handle or work near the gauges (for example, vicinity of gauge permanent storage area) during their work. The training will be conducted at the frequency specified in the following: Authorized User (Operator) Training initial Annual refresher Hazardous Materials (Hazmat) Training initial

- + Refresher every 3 years
- Ancillary Personnel Radiation Awareness Training initial

Arkansas Department of Health. Any third-party course offered

house radiation safety training is provided, it will be conducted in

by a gauge manufacturer or independent consultant may be

used, provided the Department approves the training. If in-

- + Annual refresher
- **AUTHORIZED USER TRAINING**
- Portable gauges will be used by individuals that have completed

## at least 8 hours of formal radiation safety training. Authorized Users will complete a training course approved by the NRC or

- accordance with a training program that has been approved by the Department and incorporated into the Company's radiation protection program. Operating and emergency (O&E) procedures are a required training topic. Unless training in our Company's O&E procedures is addressed during third-party training and documentation is provided by the trainer demonstrating its inclusion in the course, in-house training in O&E procedures will be provided. O&E procedures training will be conducted by the RSO or another experienced gauge operator and separate documentation of O&E procedures training will be provided for each employee-owner.
- gauges, all Authorized Users will receive the general radiation safety training as required by Paragraph RH-2803, "Instructions to Workers", of the Rules and Regulations for Control of Sources of Ionizing Radiation. The following instructions will be provided by the RSO: + Information on the storage, security, transfer, or use of portable gauges at permanent facilities and temporary jobsites

Prior to handling, transporting, or operating portable nuclear

+ Precautions and procedures used to minimize exposures + Applicable provisions of Arkansas' radiation control regulations and the Company's Radioactive Materials

+ Employee-owner's responsibility to report any unsafe

radioactive material

License

presentation.

+ The health effects associated with exposure to radiation or

conditions in the workplace + Appropriate responses to warnings made in the event of

incidents having the potential to involve radiation exposure

held at the end of the training period and attendees will be

encouraged to request clarification as necessary during the

+ This portion of the training will typically last 2 - 4 hours. The duration may vary based on attendees' comprehension of the topics covered. A question-and-answer session will be

+ Reporting requirements for occupational radiation

exposures as described in Paragraph RH-2804,

"Notifications and Reports to Individuals".

purposes. HAZMAT EMPLOYEE/DRIVER TRAINING Radioactive material contained in portable gauges is classified as hazardous material by the U.S. Department of Transportation (DOT). In accordance with DOT regulations (49)

CFR Part 172, Subpart H) employee-owners must complete

hazmat training prior to performing work that directly affects

hazardous material transportation safety. (Exception: New

Documentation of portable gauge radiation safety training for

each Authorized User will be maintained on file for inspection

driver employee-owners can transport for 90 days without the training, provided a hazmat-trained employee-owner directly supervises them.) Refresher training must be provided at least once every 3 years. Hazmat training will include general awareness/familiarization,

function-specific, and safety training. It will be provided either

in-house or by qualified third-party trainers. Completion of

the Authorized User training can satisfy the hazmat training

requirement. However, additional documentation is required.

 Documentation of hazmat training will be maintained for the duration of each employee-owner's employment, plus 90 days, and will include the following information: + The employee-owner's name and date of most recent training completed + Description, copy, or location of training materials used + Name and address of the person providing the training

+ Certification that the employee-owner has been trained and

Driver training meeting the requirements of §49 CFR 177.816

must be provided to all personnel driving vehicles containing

portable gauges and may be provided concurrently with

**ANCILLARY PERSONNEL RADIATION AWARENESS TRAINING** 

tested as required

hazmat employee training.

- Ancillary personnel (office personnel, janitorial personnel, non-radiation personnel, etc.) who may work in the general vicinity of the gauges (for example, the gauge permanent and temporary storage areas) will receive hazard awareness training to ensure that these individuals understand the
- Labor, Occupational Safety and Health Administration. The training will be conducted by the RSO for ancillary personnel at the time of employment. Refresher training for all ancillary personnel will be conducted at least annually thereafter.

possible hazards, safety precautions, and emergency

procedures related to the use and storage of radioactive

material. This training is required by the U.S. Department of

 The training will last about one hour and personnel will be encouraged to ask questions or request additional discussion of any topic covered in the training. Documentation of radiation awareness training for ancillary

personnel will be maintained on file for inspection purposes. The Company has a formal Radioactive Materials Safety Training

Program that adheres to the NRC and State Guidelines. See the

Safety Department for additional information.