



Revised Radiation Control Program Information Notice 2020-01 Effective 4/14/2020

Purpose:

This information notice (IN) is issued to provide clarification regarding the requirement in industrial radiography regulation for providing continuous visual surveillance of the operations and to be available to provide immediate assistance to prevent unauthorized entry into the restricted area during industrial radiographic operations.

Notice Summary:

After reviewing Texas rule, NRC rule, and NRC guidance, the department's determination is that, in addition to performing the tasks related to radiography, both of the required qualified radiographic personnel must be involved in providing the constant surveillance of the operations and must be able to provide immediate assistance to prevent unauthorized entry into the restricted area when the source is unshielded (is cranked out of the camera) during radiographic operations.

For example, while one radiographer is cranking the source out, timing the exposure, and cranking the source back into the camera/shield, the other qualified radiographer must be present to maintain continuous visual surveillance of the operation to protect against unauthorized entry into a radiation area or high radiation area.

The department will fully enforce this rule, as explained in this IN, beginning January 1, 2021.

Background:

Texas regulations related to this issue are found in 25 TAC §289.255 Radiation Safety Requirements and Licensing and Registration Procedures for Industrial Radiography, subsections (u)(8), and (q). NRC regulations and guidance regarding this issue are found in 10 CFR Part 34.41 Conducting industrial radiographic operations, Part 34.51 Surveillance, and NRC NUREG 1556 Volume 2 Revision 1, pages 8-36, and 8-37.

Enforcement Date: January 1, 2021:

To give licensees sufficient time to come into compliance with this IN the department **will not** start taking enforcement until January 1, 2021. Prior to January 1, 2021, if department inspectors find the second radiographer performing functions in the darkroom while the other radiographer of the 2-person crew is performing radiography, the inspector will note an observed lack of compliance with the "2-person rule," but will not issue violations or penalties for non-compliance under these circumstances. The department may ask for information pertaining to a licensee's plan to comply by the deadline.

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