ARKANSAS INFORMATION NOTICE 14-02

To: All Specific and General Fixed Gauge Licensees

From: Jared Thompson, Program Manager
Radioactive Materials Program

Date: February 18, 2014

Subject: Reporting Requirements for Fixed Gauge Shutter Failures

PURPOSE

The Arkansas Department of Health, Radioactive Materials Program is issuing this Information Notice (IN) to specific and general fixed gauge licensees to clarify the reporting requirements in the event of the failure of shutter closure mechanisms on fixed gauges. Licensees should review this information and report any failures of these mechanisms to the Department as described below. Recommendations contained in this IN are not new Arkansas Department of Health requirements; therefore, neither specific action nor written response is required.

DESCRIPTION OF CIRCUMSTANCES

Licensees who possess fixed gauges with shutters are required to test their shutters to ensure that they can be closed when needed. The shutter check requirement for specific fixed gauge licensees is imposed by license condition or by license commitment. The requirement for general fixed gauge licensees to conduct these checks are found in RH-402.b.3.B. of the ASBH Rules and Regulations for Control of Sources of Ionizing Radiation. The typical timeframe for conducting a shutter check is every six (6) months, which is acceptable for most applications where fixed gauges are used. The specific frequency at which the check is required is dictated by the Sealed Source and Device Registry.

Recently, during compliance inspections at licensee facilities authorized for fixed gauges, the Department has found evidence of shutter failures involving fixed gauges. In these instances, the fixed gauges were either not operating as designed at the time of the inspection or had been previously repaired during the inspection period by the gauge manufacturer or a fixed gauge service company. These licensees were cited for failure to notify the Department as required by RH-1502.f.2. of the ASBH Rules and Regulations for Control of Sources of Ionizing Radiation for more discussion on the reporting of fixed gauge shutter failures.

DISCUSSION

The Department is reminding licensees, that any failure (failure to open or close) of the shutter device of a fixed gauge must be reported to the Department within 24 hours of discovery as required by RH-1502.f.2.
The concern with shutters that are stuck in the open position is that when the process or line is stopped, workers performing maintenance or other work in the area could receive unintended radiation exposures. For non-radiation workers, under certain circumstances, it would not take long to exceed the applicable regulatory limits for radiation exposure.

Fixed gauge licensees should refer to the operator's manual for proper maintenance of their fixed gauges. In addition, licensees should examine shutter mechanisms for any indications that a shutter may have buildup, debris, or if any components are beginning to corrode. Identifying and correcting a potential issue with a shutter mechanism may prevent a failure of the shutter at a later time.

This IN requires no specific action or written response. If you have any questions regarding this notice, please contact the Radioactive Materials Staff at (501) 661-2173.