

# UNITED STATES MARINE CORPS TRAINING AND EDUCATION COMMAND 1019 ELLIOT ROAD QUANTICO, VIRGINIA 22134

IN REPLY REFER TO TECOMO 5104.1 C46S MAY 2 0 2009

## TRAINING AND EDUCATION COMMAND ORDER 5104.1

From: Commanding General To: Distribution List

Subj: RADIATION CONTROL SAFETY PROGRAM

Ref.

(a) MCO 5104.3A Marine Corps Radiation Safety Program

(b) MCO 5100.29A, Marine Corps Safety Program

(c) Title 10 Code of Federal Regulations, Energy (NOTAL)(d) Title 49 Code of Federal Regulations, Transportation (NOTAL)

(e) S0420-00-RAD-010 (NOTAL), NAVSEA Radiological Affairs Support Program Manual

(f) NAVMED P-5055, Radiation Health Production Manual

(g) SECNAVINST 5100.10H Department of the Navy Policy for Safety, Mishap Prevention, Occupational Health and Fire Protection Program

(h) OPNAVINST 6470.3 Naval Radiation Safety Committee

(i) MCO P4400.150E, Consumer-Level Supply Policy Manual

(j) OPNAVIST 3100.6H, Special Incident Reporting

(k) DOD 4500.9-R, Defense Transportation Regulation

(1) NRMP 10-67004-T1NP, Naval Radioactive Materials
Permit

#### Encl: (1) LOCATOR SHEET

1. <u>Situation</u>. As directed by guidance in references (a) through (1), this order provides policy, assigns responsibility and presents requirements for the administration of Training and Education Command (TECOM) Radiological Controls (RADCON) Program. This order delineates and enacts the program elements necessary to assure compliance with references (a) through (f), the Department of the Navy's NRC Materials License, and specific Naval Radioactive Materials Permits (NRMPs) issued to TECOM commands.

### 2. Cancellation. N/A

3. <u>Mission</u>. This order establishes a formal RADCON Program within TECOM structure to minimize the risk of injury to personnel and the general public, contamination of personnel and facilities, and loss of control of sources of ionizing radiation. This order applies to all TECOM commands procuring, possessing, using, or responsible for training users for sources of ionizing radiation. For the purpose of this order, sources of ionizing radiation are defined as radioactive materials in commodities and equipment or radiation—producing equipment. It does not apply to the use of any fixed or portable medical X-ray equipment used by health service personnel in support of Marine Corps operations.

#### 4. Execution

a. Commander's Intent and Concept of Operations

## (1) Commander's Intent

- (a) To protect military and civilian personnel from the harmful effects of ionizing radiation. Therefore, all exposures to ionizing radiation will be kept As Low As Reasonably Achievable (ALARA) as mandated by the Nuclear Regulatory Commission (NRC).
- (b) Enhance unit and individual readiness by maintaining an effective RADCON Program in compliance with pertinent regulations.
- (c) Provide guidance and requirements for implementing references (b) through (l), for sources of ionizing radiation used in TECOM.

## (2) Concept of Operations .

- (a) Per reference (g), the Secretary of Navy assigned to the Chief of Naval Operations (CNO) the responsibility to establish and manage the Navy Safety and Occupational Health Program, including the promulgation of appropriate directives, in coordination with the Commandant of the Marine Corps (CMC) for those matters that affect the U.S. Marine Corps.
- (b) Under the provisions of references (c), the NRC issued a Master Materials License to the Department of the Navy to control the receipt, acquisition, possession, use, and transfer of NRC-licensed radioactive material at Navy and Marine Corps activities. Reference (h) established the Navy Radiation Safety Committee (NRSC) to provide control of all radioactive material used in the Navy and Marine Corps; except for nuclear propulsion reactors and associated radioactivity, nuclear weapons, and certain components of weapons delivery systems. NRMPs are used to maintain control.
- (c) Naval Sea Systems Command Detachment, Radiological Affairs Support Office (NAVSEADET, RASO) provides technical assistance and guidance to the Navy and Marine Corps in radiological facility design surveys, radiological safety officer training, and compliance inspections for certain radiation protection programs.
- (d) Per reference (a), the CMC assigned the Commanding General, Marine Corps Logistics Command (COMMARCORLOGCOM) as the lead agent for the management of NRMPs for commodities containing radioactive materials in the Marine Corps, and act authoritatively on behalf of the CMC for all matters under auspices of the commodity NRMPs and RADCON Program throughout the Marine Corps.
- (e) A Command Radiation Safety Officer (CRSO) and an Assistant Radiation Safety Officer (ARSO) will be appointed, who shall have direct oversight of the command's radiation safety practices and procedures.
- (f) Radiation Protection Assistants (RPAs) and Responsible Officers (ROs), will be assigned to oversee NRMP compliance at subordinate commands that possess, store, and use radioactive commodities.
- (g) Radiation safety and hazards awareness information will be incorporated into the programs of instruction for each military occupational specialty school related to the procurement, receipt, storage, shipment, issue, transportation, use, and maintenance of commodities containing radioactive materials.
- (h) Ensure subordinate commands adhere to the requirements of this order, all references, and local base/installation RADCON procedures.

(i) Conduct command assessments of the adequacy of the content and implementation of the RADCON Program, as delineated in the local base order and reference (d), and report results to LRSO via this headquarters.

## (3) Subordinate Commands, (Training Command & Education Command)

- (a) Appoint a CRSO who shall have direct oversight of the Command's radiation safety practices and procedures.
- (b) Ensure the assignment of RPAs and ROs, as required, to oversee NRMP compliance at subordinate commands that possess, store, and use radioactive commodities.
- (c) Adhere to the requirements of this order, all references, and local base/installation RADCON procedures.
  - (4) TECOM Installation Commands, Marine Air Ground Task Force Training
    Command, Marine Corps Recruit Depot Parris Island, and Marine Corps
    Recruit Depot San Diego
- (a) Appoint an Installation Radiation Safety Officer (IRSO) who is responsible for coordinating the RADCON Program for sources of radiation under the control of that installation.
- (b) Ensure the development and implementation of the installation, radiation safety program, and publish and distribute applicable installation messages; bulletins; or notices, as required.
- (c) Ensure appointment of Assistant IRSO and RPAs are sufficient in numbers to administer the RADCON Program at the installation, and provide appropriate training to each RPA. In the temporary absence of the IRSO from the installation, the Assistant IRSO or RPA shall be appointed to fulfill the IRSO's duties.
- (d) If the IRSO maintains NRMP radioactive commodities or sources, inventory reports of these installation assets are required. Installation inventory reports shall be reconciled with the previous inventory to account for changes or discrepancies. The inventory report shall include this reconciliation (statement of changes, losses, additions, or updates). Submit installation physical inventory and inventory reconciliation reports to the LRSO, via this headquarters in accordance with the appropriate NRMP requirement. Maintain copies of installation and tenant activity inventory reports of licensed sources of ionizing radiation. Decommissioning files shall contain copies of inventory reports (Report Control Symbol EXEMPT), areas of use, facility surveys (Report Control Symbol EXEMPT), and reports of radiation incidents and accidents (Report Control Symbol EXEMPT).
- (e) If the IRSO maintains NRMP radioactive commodities or sources, perform required leak test (wipe tests) in accordance with the procedures in the applicable NRMPs, and forward the leak test packages to the LRSO via certified mail.
- (f) Ensure proper handling and control of radioactive materials; including receipt, storage, shipping, and disposal operations at installation activities and tenant commands.
  - (q) Maintain liaison with tenant command RSOs and RPAs.

- (h) Establish and implement a training program for RPAs and all installation personnel who are involved in the receipt, maintenance, handling, packaging, transferring, and shipping of radioactive commodities.
- (i) Provide lists of inventories and storage locations of radioactive materials and commodities to installations fire department, custodian, and emergency response personnel. Also, provide periodic training to these organizations on emergency procedures involving radiation sources.
- (j) Coordinate the procurement of any generally-licensed or license-exempt radioactive devices with the LRSO and/or CMC (SD) via this headquarters.
- (k) Establish local procedures and maintain close liaison with the Defense Reutilization and Marketing Offices (DRMO) and other base organizations to prevent the unauthorized transfer or delivery of any radioactive materials to the DRMO.
- (1) Conduct and document annual reviews of the adequacy of the content and implementation of the RADCON Program, as delineated in the installation order and reference (d), and report results to the LRSO via this headquarters.
- (m) Maintain liaison with the Navy Radiation Health Officer, assigned to the supporting Naval medical facility, and coordinate the Radiation Health Program and the RADCON Program in accordance with references (d) and (e).
- b. <u>Coordinating Instructions</u>. Submit all recommendations for revisions to this order via the chain of command to CG, TECOM, Attn: Safety Division.
  - (1) TECOM commands shall comply with this order.
- (2) Commanders shall assure that their radiation safety programs reflect command support and fulfill the requirements of licenses, NRMPs, and host installation and Federal regulations.
- 5. Administration and Logistics. Submit modifications or changes to this order for approval by the Safety Division (SD) via the chain of command prior to issuance. Submit modifications to policies affecting specific NRMPs to the permit holder for approval via this headquarters.

### 6. Command and Signal

- a. <u>Command</u>. This order is applicable to all TECOM subordinate units/commands and personnel.
  - b. Signal. This order is effective the date signed.

Distribution: A