MEMORANDUM

TO: Authorized Users of Portable Gauges

FROM: Steve Eckberg, Director

DATE: September 27, 2006

RE: Departmental Order

During our 19-21 September state inspection the Washington Department of Health delivered to the RSO a Departmental Order which enhances the security on all portable gauges possessed under our radioactive materials license. The new changes are required to be in place by October 25, 2006.

The Departmental Order specifies the following requirements in addition to those already specified in WAC 246-231 "Packages and Transportation of Radioactive Materials:"

1. When devices are not under the physical/personal control of the operator they shall be protected by three levels of security. This is similar to our security policy for device storage at a licensed storage location. The nature of the levels may vary given the circumstances and can include, but are not limited to, being locked inside the vehicle's cab, canopy or trunk. Having the transportation box chained and locked to the vehicle, secured by another method and locked to the vehicle, or placed into a secondary box bolted/chained and locked to the vehicle. The primary transport box will be locked and gauge locked at the handle. Consider the combined use of the transport box and handle locks as the third level. A site trailer or office can be used if the "three-level" method is in place there. The two outer levels will be layered so that the locked device in the locked transport box cannot be removed from the vehicle/office without breaching each of these levels.

2. When devices are being transported, or on site, and not being physically controlled by the operator, the "three-level" secured device will be covered or carried in such a way so that a passerby cannot see the box. This may be accomplished, but is not limited to, placing the box under a cover, in a secondary transportation box, in a windowless pick-up canopy, in a van, the trunk of a car, or in an office/trailer. The device should not be left in a vehicle overnight.

3. A device shall be returned to the licensed storage location each day unless the job is farther than 50 miles from that licensed storage location. This is regardless of the distance from the job location to the operator's home.
Portable Gauge
Three Level Security Checklist

Name of Authorized User: ____________________________________________
Type of Gauge: __________________________________________________

Storage Security
Location at Licensed Facility: _______________________________________

Methods Used to Secure the Device at the Storage Location:
1. Locked Transport Box (One Security Level)
2. ___________________________________________________________
3. ___________________________________________________________
4. ___________________________________________________________ (optional, not required)

Transporting Security
Vehicle Type for Transporting _______________________________________
Vehicle ID: ______________________________________________________

Methods Used to Secure the Device during Transportation:
1. Locked Transport Box (One Security Level)
2. ___________________________________________________________
3. ___________________________________________________________
4. ___________________________________________________________ (optional, not required)

Note for Transportation Security:

The two outer “levels” of security may be achieved in several ways. However, if two chains or cables are used, the following attachment method must be used.

- The locked transport box containing the portable gauge must be physically secured to the vehicle, AND
- The chain or steel cable (attached to the vehicle) must be wrapped around the transport box such that the box cannot be opened or removed unless the chain or cable is removed.

The chain or cable looped through the handles of the transport box only is no longer sufficient or acceptable.

__________________________________________
Signature

__________________________________________
Date
Please make sure your gauge is locked at the handle and there is a padlock on the case that holds the gauge. I believe all of you already have this security level in place. Some of you may have a chain attached to the hasp on the case. The hasp must be padlocked but a chain attached to the hasp is no longer allowed. The chain must be wrapped around the case in such a way that the case cannot be removed and then chained to something permanent. If you use this method the chain would then be your next level of security. Other levels of security can include placing the locked gauge/case into a locked cabinet. A room is considered a level of security only if it is kept locked at all times.

To document the changes please complete and sign the security checklist attached and return it to our office no later than October 25, 2006.

The order also requires our office to perform a physical performance audit for those gauges that are being used in the field. This audit will require close coordination between you and the RSO, so please notify our office if you plan on transporting your gauge so we can schedule time to be there. The RSO will discuss the details of the physical performance audit after receiving your completed checklist.

During the physical performance audit we will also be inspecting training records. DOH also reminded the RSO that all users of the portable gauge must have a certificate of training from the manufacturer of the gauge.

We will work with each of you to ensure we comply with the new regulations so please don’t hesitate to contact Kreta Johnson at 509-335-7058 or email kretaj@wsu.edu with any questions.

THIS MEMORANDUM SHOULD BE FILED, FOLLOWING APPROPRIATE PROMULGATION OF ITS CONTENTS, AT THE END OF SECTION XVI OF YOUR COPY OF THE RADIAITON PROTECTION PROGRAM MANUAL.

cc: Kreta Johnson, Sealed Source Custodian
File: Portable Gauge AU List