

**MEMORANDUM
OF
UNDERSTANDING
ON
RADIATION TURNBACK LEVELS FOR EPA PERSONNEL RESPONDING TO
RADIOLOGICAL EMERGENCIES**

The following Memorandum of Understanding ("MOU") is entered into between the United States Environmental Protection Agency (the "EPA" or "Agency") and the American Federation of Government Employees, Council 238 (the "Union") regarding the EPA's December 7, 2006 memorandum "Turnbacks Guidance for EPA Personnel Responding to Radiological Emergencies". The December 7, 2006 memo articulates the Gamma exposure rates at which employees are to seek further guidance before proceeding. These rates are included in Agency's Safety, Health and Environmental Management Division's Guidance Number 38 ("SHEM 38") dated March 2006.

1. The EPA has established an Administrative Control Level of 500 mrem ("ACL") committed effective dose equivalent from intake plus external whole body dose in any period of twelve (12) months. This ACL is the maximum acceptable dose for an employee during any twelve (12) month period.
2. If an employee has reached the ACL, radiological emergency response work shall be restricted until the ACL is satisfied unless a waiver is obtained as described below. The ACL will be deemed as satisfied when the employees ACL level is below 500 mrem for the twelve month period as provided for in SHEM 38 and paragraph 1. This determination will be made in accordance with SHEM 38.
3. Special circumstances may arise in which it will be necessary to permit employees to exceed the ACL to accomplish certain categories of work. When this occurs, management shall secure waivers from employees who voluntarily agree to enter into the waiver either before or as soon as possible after the work is completed. Employees will not be disciplined for refusing to receive exposures above the ACL. The dosage received under the waiver will be added to the employee's cumulative exposure record and not the dosage calculation for the twelve (12) month period. The Waiver will be secured in the manner described in SHEM 38 and requires concurrence by one of the following persons: the senior EPA official onsite, the Incident Commander, the Health and Safety Officer, or the Radiation Safety Officer (RSO). The Agency shall prepare a report as soon as practicable after the incident, documenting which employees were authorized to exceed the ACL. The report shall identify why the employee was exposed to radiation, and what their radiation doses were.
4. Employees who exceed the maximum exposure under a Waiver for critical work (10 rem) shall be restricted from working on assignments that would expose them to additional radiation.

