

Multi-Agency Workgroup

MARSSIM

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About MARSSIM

The Multi-Agency Radiation Survey and Site Investigation Manual (MARSSIM) Workgroup is a collaborative effort by the four federal agencies having major radiation protection responsibilities. The group is dedicated to providing technical processes and methods for measuring radioactivity for regulatory compliance that are accepted across federal and state governments.

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1 INTRODUCTION

1.1 Purpose and Scope of MARSSIM

Radioactive materials have been produced, processed, used, and stored at thousands of sites throughout the United States. Many of these sites—ranging in size from Federal weapons-production facilities covering hundreds of square kilometers to the nuclear medicine departments of small hospitals—were at one time or are now radioactively contaminated.

The owners and managers of a number of sites would like to determine if these sites are contaminated, clean them up if contaminated, and release them for restricted use or for unrestricted public use. The Environmental Protection Agency (EPA), the Nuclear Regulatory Commission (NRC), and the Department of Energy (DOE) are responsible for the release of sites following cleanup. These responsibilities apply to facilities under the control of Federal agencies, such as the DOE and Department of Defense (DOD), and to sites licensed by the NRC and its Agreement States. Some States have responsibilities for similar sites under their control.

The Multi-Agency Radiation Survey and Site Investigation Manual (MARSSIM) provides a nationally consistent consensus approach to conducting radiation surveys and investigations at potentially contaminated sites. This approach should be both scientifically rigorous and flexible enough to be applied to a diversity of site cleanup conditions. MARSSIM's title includes the term "survey" because it provides information on planning and conducting surveys, and includes the term "site investigation" because the process outlined in the manual allows one to begin by investigating any site (*i.e.*, by gathering data or information) that may involve radioactive contamination.

The decommissioning that follows remediation will normally require a demonstration to the responsible Federal or State agency that the cleanup effort was successful and that the release criterion (a specific regulatory limit) was met. In MARSSIM, this demonstration is given the name "final status survey." This manual assists site personnel or others in performing or assessing such a demonstration. (Generally, MARSSIM may serve to guide or monitor remediation efforts whether or not a release criterion is applied.)

As illustrated in Figure 1.1, the demonstration of compliance with respect to conducting surveys is comprised of three interrelated parts:

- I. Translate: Translating the cleanup/release criterion (*e.g.*, mSv/y, mrem/y, specific risk) into a corresponding derived contaminant concentration level (*e.g.*, Bq/kg or pCi/g in soil) through the use of environmental pathway modeling.

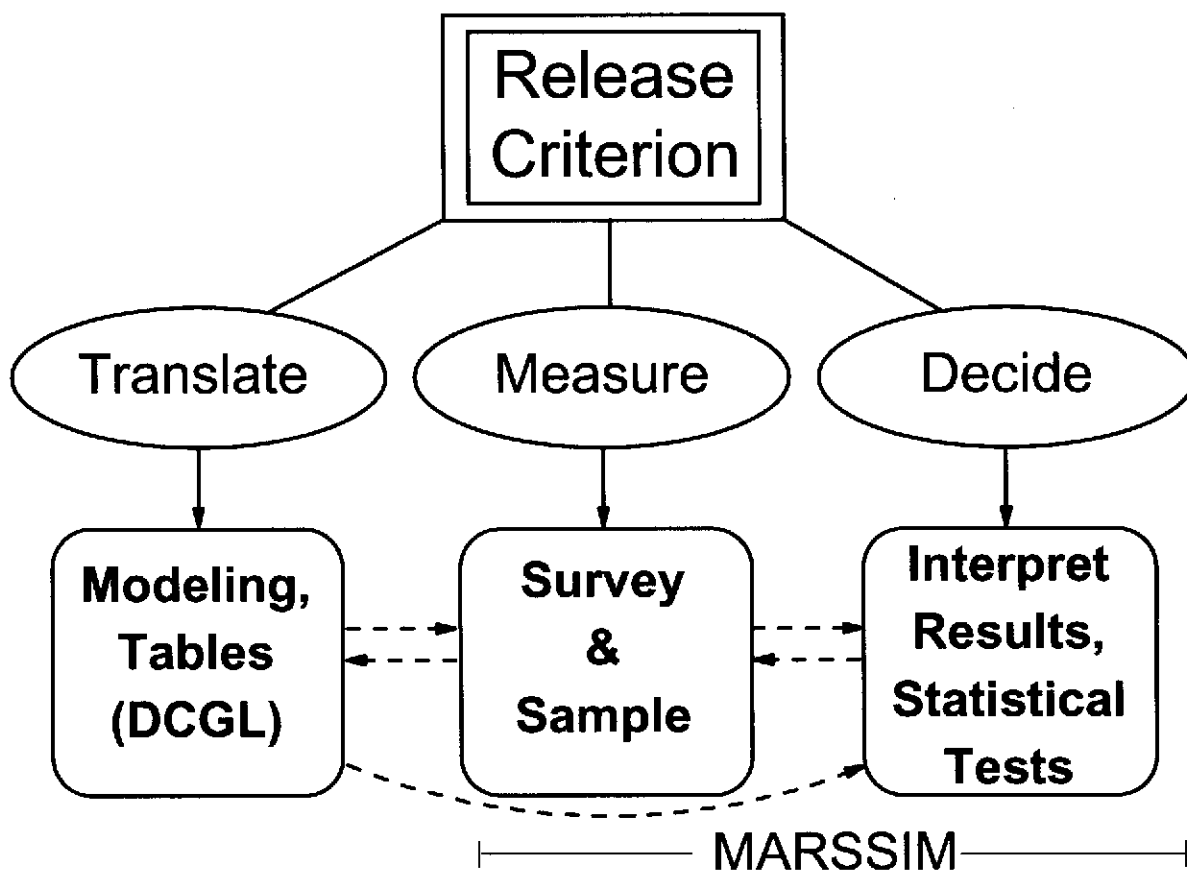


Figure 1.1 Compliance Demonstration

- II. Measure: Acquiring scientifically sound and defensible site-specific data on the levels and distribution of residual contamination, as well as levels and distribution of radionuclides present as background, by employing suitable field and/or laboratory measurement techniques.¹

- III. Decide: Determining that the data obtained from sampling does support the assertion that the site meets the release criterion, within an acceptable degree of uncertainty, through application of a statistically based decision rule.

¹ Measurements include field and laboratory analyses, however, MARSSIM leaves detailed discussions of laboratory sample analyses to another manual (*i.e.*, a companion document, the Multi-Agency Radiation Laboratory Analytical Protocols (MARLAP) manual that is currently under development).

MARSSIM presents comprehensive guidance—specifically for II and III above—for contaminated soil and buildings. This guidance describes a performance-based approach for demonstrating compliance with a dose- or risk-based regulation. This approach includes processes that identify data quality needs and may reveal limitations that enter into conducting a survey. The data quality needs stated as Data Quality Objectives (DQOs) include performance measures and goals in relation to a specific intended use of the data (EPA 1997a).

DQOs must be developed on a site-specific basis. However, because of the large variability in the types of radiation sites, it is impossible to provide criteria that apply to every situation. As an example, MARSSIM presents a method for planning, implementing, assessing, and making decisions about regulatory compliance at sites with radioactive contaminants in surface soil and on building surfaces. In particular, MARSSIM describes generally acceptable approaches for:

- planning and designing scoping, characterization, remediation-support, and final status surveys for sites with surface soil and building surface contamination
- Historical Site Assessment (HSA)
- QA/QC in data acquisition and analysis
- conducting surveys
- field and laboratory methods and instrumentation, and interfacing with radiation laboratories
- statistical hypothesis testing, and the interpretation of statistical data
- documentation

Thus, MARSSIM provides standardized and consistent approaches for planning, conducting, evaluating, and documenting environmental radiological surveys, with a specific focus on the final status surveys that are carried out to demonstrate compliance with cleanup regulations. These approaches may not meet the DQOs at every site, so other methods may be used to meet site-specific DQOs, as long as an equivalent level of performance can be demonstrated.

Table 1.1, at the end of Chapter 1, summarizes the scope of MARSSIM. Several issues related to releasing sites are beyond the scope of MARSSIM. These include translation of dose or risk standards into radionuclide specific concentrations, or demonstrating compliance with ground water or surface water regulations. MARSSIM can be applied to surveys performed at vicinity properties—those not under government or licensee control—but the decision to apply the MARSSIM at vicinity properties is outside the scope of MARSSIM. Other contaminated media (*e.g.*, sub-surface soil, building materials, ground water) and the release of contaminated components and equipment are also not addressed by MARSSIM. With MARSSIM's main focus on final status surveys, this manual continues a process of following remediation activities that are intended to remove below-surface contaminants. Therefore, some of the reasons for limiting the scope of the guidance to contaminated surface soils and building surfaces include: 1) contamination is limited to these media for many sites following remediation, 2) since many

sites have surface soil and building surface contamination as the leading source of contamination, existing computer models used for calculating the concentrations based on dose or risk generally consider only surface soils or building surfaces as a source term, and 3) MARSSIM was written in support of cleanup rulemaking efforts for which supporting data are mostly limited to contaminated surface soil and building surfaces.

MARSSIM also recognizes that there may be other factors, such as cost or stakeholder concerns, that have an impact on designing surveys. Guidance on how to address these specific concerns is outside the scope of MARSSIM. Unique site-specific cases may arise that require a modified approach beyond what is presently described in MARSSIM. This includes examples such as: 1) the release of sites contaminated with naturally occurring radionuclides in which the concentrations corresponding to the release criteria are close to the variability of the background and 2) sites where a reference background cannot be established. However, the process of planning, implementing, assessing, and making decisions about a site described in MARSSIM is applicable to all sites, even if the examples in this manual do not meet a site's specific objectives.

Of MARSSIM's many topics, the Data Quality Objective (DQO) approach to data acquisition and analysis and the Data Quality Assessment (DQA) for determining that data meet stated objectives are two elements that are a consistent theme throughout the manual. The DQO Process and DQA approach, described in Chapter 2, present a method for building common sense and the scientific method into all aspects of designing and conducting surveys, and making best use of the obtainable information. This becomes a formal framework for systematizing the planning of data acquisition surveys so that the data sought yield the kind of information actually needed for making important decisions—such as whether or not to release a particular site following remediation.

1.2 Structure of the Manual

MARSSIM begins with the overview of the Radiation Survey and Site Investigation Process in Chapter 2—Figures 2.4 through 2.8 are flowcharts that summarize the steps and decisions taken in the process. Chapter 3 provides instructions for performing an Historical Site Assessment (HSA)—a detailed investigation to collect existing information on the site or facility and to develop a conceptual site model. The results of the HSA are used to plan surveys, perform measurements, and collect additional information at the site. Chapter 4 covers issues that arise in all types of surveys. Detailed information on performing specific types of surveys is included in Chapter 5. Guidance on selecting the appropriate instruments and measurement techniques for each type of measurement is in Chapters 6 and 7. Chapter 6 discusses direct measurements and scanning surveys, and Chapter 7 discusses sampling and sample preparation for laboratory measurements. The interpretation of survey results is described in Chapter 8. Chapter 9 provides guidance on data management, quality assurance (QA), and quality control (QC). Information on specific subjects related to radiation site investigation can be found in the appendices.

MARSSIM contains several appendices to provide additional guidance on specific topics. Appendix A presents an example of how to apply the MARSSIM guidance to a specific site. Appendix B describes a simplified procedure for compliance demonstration that may be applicable at certain types of sites. Appendix C summarizes the regulations and requirements associated with radiation surveys and site investigations for each of the agencies involved in the development of MARSSIM. Detailed guidance on the DQO Process is in Appendix D, and Appendix E has guidance on DQA. Appendix F describes the relationships among MARSSIM, the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), and the Resource Conservation and Recovery Act (RCRA). Sources of information used during site assessment are listed in Appendix G. Appendix H describes field survey and laboratory analysis equipment that may be used for radiation surveys and site investigations. Appendix I offers tables of statistical data and supporting information for interpreting survey results described in Chapter 8. The derivation of the alpha scanning detection limit calculations used in Chapter 6 is described in Appendix J. Comparison tables for QA documents are in Appendix K. Appendix L lists the regional radiation program managers for each of the agencies participating in the development of MARSSIM. Appendix M lists publications that serve as resources describing sampling methods. Information on data validation is provided in Appendix N.

MARSSIM is presented in a modular format, with each module containing guidance on conducting specific aspects of, or activities related to, the survey process. Followed in order, each module leads to the generation and implementation of a complete survey plan. Although this approach may involve some overlap and redundancy in information, it also allows many users to concentrate only on those portions of the manual that apply to their own particular needs or responsibilities. The procedures within each module are listed in order of performance and options are provided to guide a user past portions of the manual that may not be specifically applicable to the user's area of interest. Where appropriate, checklists condense and summarize major points in the process. The checklists may be used to verify that every suggested step is followed or to flag a condition in which specific documentation should explain why a step was not needed.

Also included in the manual is a section titled Roadmap. The roadmap is designed to be used with MARSSIM as a quick reference for users already familiar with the process of planning and performing radiation surveys. The roadmap gives the user basic guidance, rules of thumb, and references to sections in the manual containing detailed guidance.

MARSSIM, which is based on a graded approach, also contains a simplified procedure (see Appendix B) that many users of radioactive materials may—with the approval of the responsible regulatory agency—be able to employ to demonstrate compliance with the release criterion. Sites that may qualify for simplified release procedures are those in which the radioactive materials used were 1) of relatively short half-life (*e.g.*, $t_{1/2} \leq 120$ days) and have since decayed to insignificant quantities, 2) kept only in small enough quantities so as to be exempted or not

requiring a specific license from a regulatory authority, 3) used or stored only in the form of non-leaking sealed sources, or 4) combinations of the above.

1.3 Use of the Manual

Potential users of this manual are Federal, State, and local government agencies having authority for control of radioactive environmental contamination; their contractors; and other parties, such as organizations with licensed authority to possess and use radioactive materials. The manual is intended for a technical audience having knowledge of radiation health physics and an understanding of statistics as well as experience with the practical applications of radiation protection. An understanding of instrumentation and methodologies and expertise in planning, approving, and implementing surveys of environmental levels of radioactive material is assumed. This manual has been written so that individuals responsible for planning, approving, and implementing radiological surveys will be able to understand and apply the guidance provided here. Certain situations and sites may require consultation with more experienced personnel.

MARSSIM provides guidance for conducting radiation surveys and site investigations. MARSSIM uses the word "should" as a recommendation, that ought not be interpreted as a requirement. The reader need not expect that every recommendation in this manual will be taken literally and applied at every site. Rather, it is expected that the survey planning documentation will address how the guidance will be applied on a site-specific basis.

As previously stated, MARSSIM supports implementation of dose- or risk-based regulations. The translation of the regulatory dose limit to a corresponding concentration level is not addressed in MARSSIM, so the guidance in this manual is applicable to a broad range of regulations, including risk- or concentration-based regulations. The terms dose and dose-based regulation are used throughout the manual, but these terms are not intended to limit the use of the manual.

Note that Federal or State agencies that can approve a demonstration of compliance may support requirements that differ from what is presented in this version of MARSSIM. *It is essential, therefore, that the persons carrying out the surveys, whether they are conducting surveys in accordance with the simplified approach of Appendix B or the full MARSSIM process, remain in close communication with the proper Federal or State authorities throughout the compliance demonstration process.*

1.4 Missions of the Federal Agencies Producing MARSSIM

MARSSIM is the product of a multi-agency workgroup with representatives from EPA, NRC, DOE, and DOD. This section briefly describes the missions of the participating agencies. Regulations and requirements governing site investigations for each of the agencies associated with radiation surveys and site investigations are presented in Appendix C.

1.4.1 Environmental Protection Agency

The mission of the U.S. Environmental Protection Agency (EPA) is to improve and preserve the quality of the environment, on both national and global levels. The EPA's scope of responsibility includes implementing and enforcing environmental laws, setting guidelines, monitoring pollution, performing research, and promoting pollution prevention. EPA Headquarters maintains overall planning, coordination, and control of EPA programs, and EPA's ten regional offices are responsible for executing EPA's programs within the boundaries of each region. EPA also coordinates with, and supports research and development of, pollution control activities carried out by State and local governments.

1.4.2 Nuclear Regulatory Commission

The mission of the U.S. Nuclear Regulatory Commission (NRC) is to ensure adequate protection of public health and safety, the common defense and security, and the environment in the use of certain radioactive materials in the United States. The NRC's scope of responsibility includes regulation of commercial nuclear power reactors; non-power research, test, and training reactors; fuel cycle facilities; medical, academic, and industrial uses of nuclear materials; and the transport, storage, and disposal of nuclear materials and waste. The Energy Reorganization Act of 1974 and the Atomic Energy Act of 1954, as amended, provide the foundation for regulation of the Nation's commercial use of radioactive materials.

1.4.3 Department of Energy

The mission of the Department of Energy (DOE) is to develop and implement a coordinated national energy policy to ensure the availability of adequate energy supplies and to develop new energy sources for domestic and commercial use. In addition, DOE is responsible for the development, construction and testing of nuclear weapons for the U.S. Military. DOE is also responsible for managing the low- and high-level radioactive wastes generated by past nuclear weapons and research programs and for constructing and maintaining a repository for civilian radioactive wastes generated by the commercial nuclear reactors. DOE has the lead in decontaminating facilities and sites previously used in atomic energy programs.

1.4.4 Department of Defense

The global mission of the Department of Defense (DOD) is to provide for the defense of the United States. In doing this, DOD is committed to protecting the environment. Each military service has specific regulations addressing the use of radioactive sources and the development of occupational health programs and radiation protection programs. The documents describing these regulations are used as guidance in developing environmental radiological surveys within DOD and are discussed in Appendix C.

Table 1.1 Scope of MARSSIM

Within Scope of MARSSIM		Beyond Scope of MARSSIM	
<i>Guidance</i>	MARSSIM provides technical guidance on conducting radiation surveys and site investigations.	<i>Regulation</i>	MARSSIM does not set new regulations or non-technical issues (e.g., legal or policy) for site cleanup. Release criterion will be provided rather than calculated using MARSSIM.
<i>Tool Box</i>	MARSSIM can be thought of as an extensive tool box with many components—some within the text of MARSSIM, others by reference.	<i>Tool Box</i>	Many topics are beyond the scope of MARSSIM, for example: -a public participation program -packaging and transportation of wastes for disposal -decontamination and stabilization techniques -training
<i>Measurement</i>	The guidance given in MARSSIM is performance-based and directed towards acquiring site-specific data.	<i>Procedure</i>	The approaches suggested in MARSSIM vary depending on the various site data needs—there are no set procedures for sample collection, measurement techniques, storage and disposal established in MARSSIM.
<i>Modeling</i>	The interface between environmental pathway modeling and MARSSIM is an important survey design consideration addressed in MARSSIM.	<i>Modeling</i>	Environmental pathway modeling and ecological endpoints in modeling are beyond the scope of MARSSIM.

Table 1.1 Scope of MARSSIM (continued)

Within Scope of MARSSIM		Beyond Scope of MARSSIM	
<i>Soil and Buildings</i>	The two main media of interest in MARSSIM are contaminated surface soil and building surfaces.	<i>Other Media</i>	MARSSIM does not cover other media, including construction materials, equipment, subsurface soil, surface or subsurface water, biota, air, sewers, sediments or volumetric contamination.
<i>Final Status Survey</i>	The focus of MARSSIM is on the final status survey as this is the deciding factor in judging if the site meets the release criterion.	<i>Materials or Equipment</i>	MARSSIM does not recommend the use of any specific materials or equipment—there is too much variability in the types of radiation sites—this information will be in other documents.
<i>Radiation</i>	MARSSIM only considers radiation-derived hazards.	<i>Chemicals</i>	MARSSIM does not deal with any hazards posed by chemical contamination.
<i>Remediation Method</i>	MARSSIM assists users in determining when sites are ready for a final status survey and provides guidance on how to determine if remediation was successful.	<i>Remediation Method</i>	MARSSIM does not discuss selection and evaluation of remedial alternatives, public involvement, legal considerations, policy decisions related to planning
<i>DQO Process</i>	MARSSIM presents a systemized approach for designing surveys to collect data needed for making decisions such as whether or not to release a site.	<i>DQO Process</i>	MARSSIM does not provide prescriptive or default values of DQOs.
<i>DQA</i>	MARSSIM provides a set of statistical tests for evaluating data and lists alternate tests that may be applicable at specific sites.	<i>DQA</i>	MARSSIM does not prescribe a statistical test for use at all sites.