 CM9000 (2019-06)	<b>Title:</b>	<b>Stelco Radiation Protection Policy for Purchased Ferrous Metals</b>		
	<b>Number:</b>	<b>A0-025-081-039</b>		
	<b>Revision Date:</b>	02/03/2023	<b>Plant:</b>	Stelco
	<b>Approver:</b>	Director	<b>Division:</b>	General
	<b>Document Type:</b>	Policy	<b>Department:</b>	Safety
<b>Area:</b>			General	

## STELCO RADIATION PROTECTION POLICY FOR PURCHASED FERROUS METALS

### 1.0 PURPOSE

The purpose of this policy is to ensure all incoming shipments of ferrous metals or alloys do not contain radioactive substances and eliminate the risk of contaminating Stelco assets.

Radiation protection is critical at Stelco, and no exceptions will be made to this policy. Stelco will strictly enforce this policy and any non-adherence to this policy will be dealt with at the highest level at Stelco.

### 2.0 DEFINITIONS

**Buyer** – Stelco representative that purchases goods or services from a vendor.

**Carrier** – A person or company that transports goods for any person or company.

**CNSC** – Canadian Nuclear Safety Commission

**ESS** – Stelco Emergency Services and Security

**Ferrous Metals** –Metals and alloys that contain iron including steel, pig iron, stainless steel, cast iron, B-scrap etc.

**RSO** - Radiation Safety Officer

**Scrap** – Metals that are recycled and processed to sell for profit.

**Vendor** – Any supplier of goods or services with a Stelco purchase order.

### 3.0 REFERENCES

[CNSC Acts and Regulations](#)

[CNSC Alarm Response Guidelines for Radiation Portal Monitoring Systems](#)

### 4.0 REQUIREMENTS

4.1 All vendors must sign off on this policy annually and provide it to the Buyer.


4.2 All ferrous shipments must be radiation certified before arriving at Stelco.

4.3 All ferrous shipments must be delivered directly after radiation certification.

4.4 All shipments of ferrous materials must pass through Stelco’s radiation detectors before being offloaded into the facility. This includes shipments by truck, rail, barge, or boat.

4.5 All vendors must comply with all CNSC regulations and guidelines.

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4.6 All vendors and carriers must always cooperate with Stelco’s RSO, ESS, Buyer, and Government Officials.

**4.7 Scrap Shipped from Vendor’s Yard**

4.7.1 The yard must have stationary radiation detection equipment that has been calibrated annually by a qualified person (refer to References). Stationary detectors must be placed in an area that carriers cannot bypass the system. Portable handheld radiation survey meters will not be excepted for radiation certification.

4.7.2 A copy of the annual calibration documentation for the stationary detector system must be sent to the Buyer before the certificate expires. The Buyer will share the calibration certificate with ESS and Stelco RSO.

4.7.3 Upon leaving the yard, the carrier must be in possession of an original signed bill of lading (BOL). The BOL and signature must be original. Photocopies, alterations, or other reproduction of signature will not be accepted. This BOL is an official document acceptable in court proceedings.

4.7.4 The BOL must be stamped and signed with radiation certification after outbound detection. The stamp must identify the location of the radiation certification and be signed with a full legible name.

4.7.4.1 Alternatively, there may be a preprinted certification statement on the bill of lading that is signed by the appropriate onsite yard personnel when the load has passed through radiation detection going outbound.

4.7.5 A list of printed name(s) and signature(s) of the Vendor’s onsite yard personnel approving the radiation certification must be sent to the Buyer and ESS.

**4.8 Scrap not shipped directly from Vendor’s Yard**


4.8.1 All requests for use of this provision must be approved by Stelco’s RSO at least annually.

4.8.2 The Vendor must inform the Buyer of this situation before the shipment of materials.

4.8.3 The Vendor will inform the Buyer where the material will originate and the yard that will perform radiation certification.

4.8.4 A procedure will be developed to ensure proper radiation certification. This procedure will be approved by the Stelco RSO before shipments and followed with a hundred percent compliance. Any deviations from the procedure will need to be reviewed before the next shipment.

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4.8.5 Any loads originating from a site other than the Vendor's yard and delivered directly to Stelco must be radiation certified by stationary radiation detectors. Stationary detectors must be placed in an area that carriers cannot bypass the system. Portable handheld radiation survey meters will not be excepted for radiation certification.

4.8.6 The third-party yard must calibrate their detection equipment annually by a qualified person (Refer to references). A copy of the annual calibration documentation for the stationary detector system must be sent to the Buyer before the certificate expires. The Buyer will share the calibration certificate with ESS and Stelco RSO.

4.8.7 The load must be shipped on an original BOL with an original shipper's signature. No photocopy or other reproduction of the signature will be accepted.

4.8.8 The BOL must be stamped and signed with radiation certification after outbound detection. The stamp must identify the location of the radiation certification and be signed with a full legible name.

4.8.8.1 If an existing radiation certification statement appears on the BOL referring to the vendor's yard, the statement must be crossed off or blacked out (this statement cannot be signed by a third-party yard as radiation certification).

#### **4.9 Alloys, Slabs, and Coils from Certified Radiation-Free Companies**

4.9.1 Alloys, Slabs, and Coils purchased from external foundry and steel companies must demonstrate their commitment to a radiation-free product.

4.9.2 Before purchasing and shipping materials to Stelco, the RSO must receive a copy of the radiation-free commitment and approve the vendor. During this process, the RSO will be allowed to verify their radiation protection program.

4.9.3 All vendors must meet the CNSC regulations.

#### **4.10 Radioactive Loads**

4.10.1 If a load is confirmed to be radioactive with dose rates higher than the background, Stelco will reject and isolate the load.

4.10.2 If requested, the vendor must send their RSO or trained delegate to investigate the load before the carrier is released.


4.10.3 The CNSC must be notified if any of the following are found:

4.10.3.1 An orphan sources

4.10.3.2 A radiation device

4.10.3.3 A device containing radium luminous compound.

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4.10.3.4 Radiation field exceeds 25usv/h within 5cm of survey meter.

4.10.3.5 Loose contamination is detected.

4.10.3.6 The Source of radiation is not identified.

4.10.4 The vendor must send a copy of their findings to the Stelco RSO within 24 hours of the incident. This will include a copy of any communication with government officials, survey meter model, survey meter calibration, type of source, isotope, dose rate readings, and the method of disposal.

#### 4.11 Stelco Radiation Audits

4.11.1 The Stelco RSO must approve all vendors supplying ferrous materials to Stelco. This approval must be repeated regularly as specified by Stelco.

4.11.2 Audits will also be required for all offsite facilities performing checks on Stelco loads. The audits will be conducted relative to a supplier's radiation safety program, and Stelco expects, at a minimum, compliance with the CNSC guideline.

### 5.0 CONSEQUENCES

Any failure to adhere to the above-stated policy will result in the following:

- 1) The offending load will be rejected by Stelco security and may be redirected to an offsite facility that has been approved by Stelco's RSO for certification before entering the mill for unloading.
- 2) The rejection will be recorded, and the buyer will request an explanation from the vendor for the noncompliance. A response must be made in a reasonable time and shared with the Stelco RSO.
- 3) Depending on the circumstances surrounding the shipment, there may be an incident report written by Stelco security that will be forwarded to plant management. This would require a formal corrective action (appendix) to be submitted to Stelco and may result in the vendor ceasing to supply scrap to Stelco.

### 6.0 POLICY REVIEW


This policy will be reviewed at a minimum on an annual basis.

#### Revision History

Date	Description of Change	Initials
February 2021	Reviewed and revised	BP
Feb 2023	Added 4.3	BP

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**APPENDIX:**

Radiation Supplier Formal Corrective Action Form		
Date of Event:	Supplier:	Carrier:
Driver:	Truck Number:	BOL:
Summary of the Event:		
Violation(s):		
Corrective Action(s):		
Radiation Source Information (If Applicable):		
Survey Meter:	Calibration Date:	
Background:	Dose Rate (sv/h):	
Type of Source:	Isotope:	
Method of Disposal:	CNSC Officer Contacted:	
Completed by:		
Printed Name:	Title:	
Signature:	Date:	

Vendor Signature: \_\_\_\_\_

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**VENDOR POLICY SIGN-OFF**

**Executed By:** Stelco

**Name:** \_\_\_\_\_ **Title:** \_\_\_\_\_

**Signature:** \_\_\_\_\_ **Date:** \_\_\_\_\_

**Vendor:** \_\_\_\_\_ **Location(s):** \_\_\_\_\_

**Name:** \_\_\_\_\_ **Title:** \_\_\_\_\_

**Signature:** \_\_\_\_\_ **Date:** \_\_\_\_\_

Vendor Signature: \_\_\_\_\_

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