Annex

No.	Text (Guideline)		Questions	Answers
1	Article 2 (No. 2-1,2)	Appli-cability	Is it correct to assume that the Ionizing Radiation Ordinance for Decontamination applies to decontamination works conducted at the storage area in conditions where the exterior walls of a storage shed, soil at the storage site or surrounding areas are contaminated (secondary contamination) so long as the site falls inside the areas subject to the Act on Special Measures Concerning the Handling of Radioactive Pollution? Is it correct to assume that the Ionizing Radiation Ordinance for Decontamination does not apply to storage areas located inside an isolated building, etc. where the control of radioactive substances is possible? Does the Ionizing Radiation Ordinance apply to storage areas where the ambient dose rate exceeds 2.5 μSv/h?	The Ionizing Radiation Ordinance for Decontamination applies to decontamination and related works conducted at storage areas for removed soil and wastes at special contamination areas stipulated in Section 1, Article 25 of the Act on Special Measures Concerning the Handling of Radioactive Pollution or intensive contamination survey areas stipulated in Section 1, Article 32 of the same Act (hereinafter referred to as "special decontamination areas, etc."). The Ionizing Radiation Ordinance for Decontamination does not apply to storage operations that are conducted as part of disposal works of contaminated soil and wastes (works involving facilities such as water supply and sewerage facilities, incineration facilities, intermediate treatment facilities, and landfill treatment facilities), even if they are conducted inside the special contamination areas, but they are subject to the Ionizing Radiation Ordinance.
2	Article 2 (No. 2-1,2)	Applicab-ility	The Ionizing Radiation Ordinance for Decontamination applies to decontamination and related works conducted in the areas covered by the Act on Special Measures Concerning the Handling of Radioactive Pollution regardless of the frequency of the works. Is it correct to assume then the Ordinance also applies to one-time decontamination and related works?	The Ionizing Radiation Ordinance for Decontamination applies to employers who conduct decontamination and related works in the special contamination areas, etc. The Ordinance therefore applies to employers who carry out decontamination and related works as business operations inside the special contamination areas, etc. regardless of the frequency of their operations.
3	Article 2 (No. 2-1,2)	Applicab-ility	Is it correct to assume that operations other than decontamination works covered by the Act on Special Measures Concerning the Handling of Radioactive Pollution (operations outside the relevant area) should be conducted in accordance with the guidelines?	The Ionizing Radiation Ordinance for Decontamination does not apply to employers who conduct decontamination and related works in areas outside the special contamination areas, etc. However, as stipulated in No. 2-2 of the guidelines, they must take any or all of the necessary measures among the following: exposure dose control as shown in No.3; prevention of the spread of contamination and measures to prevent internal exposure as shown in No. 5; and education of workers, etc. as shown in No. 6.

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4	Article 2 (No. 2-1,2)	Applicab-ility	It is assumed that the Ionizing Radiation Ordinance for Decontamination applies to decontamination and related works contained in the "Decontamination Plan" based on the Act on Special Measures Concerning the Handling of Radioactive Pollution among all the decontamination and related works conducted inside the intensive contamination survey areas shown in the Act. Is it correct to assume that the Ionizing Radiation Ordinance for Decontamination applies to decontamination and related works even if such works are not included in the "Decontamination Plan" so long as they are conducted inside the areas covered by the Act on Special Measures Concerning the Handling of Radioactive Pollution?	That is correct. The Ionizing Radiation Ordinance for Decontamination applies to employers who conduct decontamination and related works or works under a designated dose rate inside the special contamination areas.
5	Article 2 (No. 2-1,2)	Applicab-ility	Does the Ionizing Radiation Ordinance for Decontamination apply to works, which include the additional "works for handling designated contaminated soil and wastes," that are conducted in all areas of the designated municipalities (including areas with ambient dose rates that are 0.23 μ Sv or lower)?	Legally, the Ionizing Radiation Ordinance for Decontamination and the guidelines apply to decontamination and related works conducted inside the "intensive contamination survey areas" including areas with ambient dose rates of 0.23 μ Sv or lower, as stipulated in Section 1, Article 32 of the Act on Special Measures Concerning the Handling of Radioactive Pollution.
6	Article 2 (No. 2-1,2)	Applicab-ility	Following the revision on 1 July 2012, are there works to which the guidelines -- but not the Ionizing Radiation Ordinance for Decontamination -- apply as in previous cases involving works similar to decontamination works?	Laws and ordinances apply to works similar to decontamination works since they are regarded as works for handling designated contaminated soil and wastes. Works to which the guidelines -- but not laws and ordinances – apply are: decontamination works conducted by a party other than the employer engaged in decontamination and related works at its own premises and decontamination and related works or works for collecting waste, etc. conducted outside the special decontamination areas, etc.
7	Article 2 (No. 2-1,2)	Applicab-ility	The guidelines on decontamination and related works state, "temporary works that are completed in a short time are not included in works handling designated contaminated soil and wastes." What kind of cases does this description refer to?	Temporary works refer to operations conducted temporarily as the need arises, which are different from original works normally conducted at the relevant site. When the operations are conducted on a continuous and repetitive basis as original operations, they do not correspond to temporary works even if the operation is completed in a short time (1-2 hours).
8	Article 2 (No. 2-1,2)	Applicab-ility	Regarding the "washing, stripping and scraping of roofs, exterior walls, concrete, asphalt and other elements" shown as specific examples of "works for handling designated contaminated soil and wastes," how do they differ from "decontamination and related works" to which the Ionizing Radiation Ordinance for Decontamination applies?	Works for handling designated contaminated soil and wastes do not include works whose objective is decontamination and related works.

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9	Article 2 (No. 2-1,2)	Applicab-ility	Surveys are conducted for tunnel works, etc. in the initial stage of drilling the tunnel opening to examine whether the work corresponds to works for handling designated contaminated soil and wastes. Since contaminated soil is no longer found after the drilling process proceeds by about 3 meters, would it be correct to assume that such works do not correspond to works for handling designated contaminated soil and wastes from that point on?	The level of soil contamination is presumed to drop as the drilling proceeds in tunnel works. For this reason, it is acceptable to assume that such works do not correspond to works for handling designated contaminated soil and wastes after having confirmed that the works do not correspond to works handling designated contaminated soil and wastes.
10	Article 2 (No. 2-1,2)	Applicab-ility	Is it correct to assume that works such as earth retaining works in which cement milk and soil are mixed underground and piling works that do not accompany soil drilling do not correspond to "works for handling designated contaminated soil and wastes"?	Earth retaining works may correspond to works for handling designated contaminated soil and wastes (works for handling designated contaminated soil and wastes) depending on the level of soil contamination.
11	Article 2 (No. 2-1,2)	Applicab-ility	When the level of soil contamination has fallen to 10,000 Bq/kg or less at a site as a result of decontamination, is it acceptable to assume that the works in question no longer correspond to works for handling designated contaminated soil and wastes based on that data?	That is correct.
12	Article 2 (No. 2-1,2)	Applicab-ility	In reference to "employers who conduct works under a designated dose rate," consider a case where an employer in the manufacturing industry, which has a plant in an area where the ambient dose rate exceeds 2.5 μ Sv/h, sends its head office employees to the plant to engage in restoration works that differ from their normal work operations. Is it correct to assume that the Ionizing Radiation Ordinance for Decontamination does not apply to such restoration works because they are not "works under a designated dose rate"?	Works under a designated dose rate refer to works other than decontamination and related works conducted at locations where the ambient dose exceeds 2.5 μ Sv/h. Such works have no practical limitations, which means there is a need to exercise caution on determining whether the works are being conducted as part of normal business operations, unlike in the case of decontamination and related works. For instance, if an employer in the manufacturing industry, which has a plant in an area where the ambient dose exceeds 2.5 μ Sv/h, sends its head office employees to the plant to engage in restoration works, and the company has a department whose primary function is the repair and maintenance of production facilities, such as the maintenance and inspection department, there is a high likelihood that such restoration works are regarded as applicable to the works under a designated dose rate. This is because the business site is considered to be implementing the same actions on a continuous and repetitive basis, regardless of whether support workers from the head office are assigned to restoration works as their job functions.

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13	Article 2 (No. 2-1,2)	Applicab-ility	No. 2 (5) of the guidelines on decontamination and related works describes the details of operations that have the possibility of corresponding to works for handling designated contaminated soil and wastes (so-called gardening operations). When none of the sites is believed to have an average ambient dose rate of 2.5 μSv/h or higher, considering the conditions of past dose measurements and other data, would an employer who plans to conduct the operation outlined above need to measure the average ambient dose rate (for the existence of rates above 2.5 μSv/h) or the level of radioactive materials in the soil?	The indicators used to clearly determine that certain works do not correspond to works handling designated contaminated soil and wastes according to 2-(6) of the "Method of Measuring Radioactivity Concentration of Contaminated Soil and Waste," Annex 6 of the guidelines on decontamination and related works, are: (1) Based on Annex 6-2 of the guidelines on decontamination and related works or a simplified chart in 6-3 or other knowledge, (2) Depth of the soil drilling, and (3) Average ambient dose rate of the work area "Other knowledge" mentioned here refers to any evidence that would enable one to determine that the soil and wastes in farmland, forest, etc. that serve as preconditions for 6-2 and 6-3 show roughly the same conditions as the soil and wastes at the work area. Specifically, it refers to cases where the soil is shown to be relatively uniform over a wide area such as ~~a~~ sports grounds or river banks. Therefore, the work in question can be judged as not corresponding to works for handling designated contaminated soil and wastes when all the items from (1) to (3) shown below are fulfilled: (1) The soil of the work area is relatively uniform over a wide area and the area does not have spots of potential high concentrations including those that collect rainwater (such as the places described in (3)C, 6-3 of the Guideline Annex making the area applicable under Items 6-2 and 6-3; (2) The average ambient dose rate is sufficiently below 10,000 Bq/kg when 6-2 and 6-3 are applied; (3) Works that consist solely of handling the top soil layer that runs 15 cm from the earth's surface are not conducted. Regarding the average ambient dose rate, the intention is not to obligate employers to measure the rate prior to works when the average ambient dose rate at the work site is clearly shown to be below 2.5 μSv/h. This means that the work in question does not correspond to works handling designated contaminated soil and wastes based on airborne monitoring and other data released by the Ministry of Education, Culture, Sports, Science and Technology.
14	Article 2 (No. 2-1,2)	Applicab-ility	Cesium is often discussed in issues involving radioactive substances. What about strontium and plutonium? Should these substances be regarded as issues also?	The Expert Meeting on Radiological Protection for Decontamination and Related Works has found that the abundance ratio of strontium and plutonium dose rates was less than 1/100 of that of cesium, leading the Meeting to conclude from the cesium dose rate measurements that strontium and plutonium do not pose a problem in exposure dose control.
15	Article 2 (No. 2-1,2)	Applicab-ility	To which works does the Ionizing Radiation Ordinance for Decontamination apply in terms of location such as the revised evacuation area and restricted area?	The Ordinance applies to works conducted in special decontamination areas, etc. (special decontamination areas, areas where it is expected that the residents will have difficulties in returning for a long time, areas in which the residents are not permitted to live, and areas in which evacuation orders are ready to be lifted and intensive contamination survey areas).

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16	Article 2 (No. 2-1,2)	Applicab-ility	What kind of public works correspond to works for handling designated contaminated soil and wastes?	Works for handling designated contaminated soil and wastes refer to works that handle contaminated soil and wastes with radioactivity concentrations that exceed 10,000 Bq/kg among the soil contaminated by radioactive materials discharged by the accident. Specific examples of operations that handle contaminated soil and wastes, which form the preconditions for works for handling designated contaminated soil and wastes, include: earthmoving works for the reconstruction of livelihood infrastructure (preparatory works, drilling/transportation, embankment/compaction, land leveling/shaping and slope protection) as well as earthmoving-related operations for foundation works, temporary works, road works, water supply and sewerage works, water pipe construction and drainage works, and farmland cultivation works. However, this does not apply when such works are conducted on a temporary basis designed to be completed in a short time.
17	Article 2 (No. 2-1,2)	Applicab-ility	If the work area for conducting decontamination and related works has a local spot(s) where the dose rate exceeds 2.5 μ Sv/h, would the area correspond to "work areas with an average ambient dose rate exceeding 2.5 μ Sv/h"?	In case the work area has a local spot(s) with high average ambient dose rates, the area is deemed to correspond to "work areas with an average ambient dose rate exceeding 2.5 μ Sv/h" if its average ambient dose rate in time average, as calculated in accordance with the formula shown in 3(4) of Annex 5 of the guidelines on decontamination and related works, is higher than 2.5 μ Sv/h.
18	Article 2 (No. 2-1,2)	Applicab-ility	Section 5, Article 2 of the Ionizing Radiation Ordinance for Decontamination defines works of decontamination, etc. as "works aimed at removing soil, fallen leaves, sludge, etc. involved in the contamination." What would the difference be between such works and ordinary cleaning works that are carried out to beautify the environment?	Ordinary cleaning works that are carried out to beautify the environment do not correspond to decontamination and related works since such works are not conducted for the purpose of decontamination. However, works handling contaminated soil and wastes whose levels of radioactivity concentration exceed 10,000 Bq/kg or works conducted in areas whose average ambient dose rates exceed 2.5 μ Sv/h are regarded as works for handling designated contaminated soil and wastes or works under a designated dose rate.

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19	Article 2 (No. 2-1,2)	Applicab-ility	The provisions say, "Regarding decontamination and related works (works for handling designated contaminated soil and wastes) conducted in work areas whose average ambient dose rates are 2.5 μSv/h or lower," where the measurement of external exposure dose rate is mandated, "works should be limited to those that plan to engage workers in work at sites where the rates exceed 2.5 μSv/h, in view of the difficulty of confining work areas due to the nature of the work, which includes the restoration of life-related infrastructure." Specifically, what kind of works correspond to the above?	Such works include construction and incidental works where the location of work may change from day to day.
20	Article 2 (No. 2 under a designated dose rate)	Applicab-ility	Is it correct to assume that works conducted by a company that engages its own workers in civil engineering works involving soil on its premises whose radioactivity concentrations exceed 10,000 Bq/kg are not applicable to the designated works?	Works conducted by an employer engaged in the business of civil engineering correspond to works for handling designated contaminated soil and wastes. "Business" here refers to ongoing business for profit-oriented operations as well as continuous activities performed by non-profit operators such as public welfare organizations and religious organizations. Therefore, when a company engages its own workers in civil engineering works involving soil on its premises whose radioactivity concentrations exceed 10,000 Bq/kg, the judgment on the applicability is made on whether the company has the intention of carrying out the same actions on a continuous and repetitive basis. For this reason, for a civil engineering company that performs civil engineering works on its premises, such works are highly likely to be considered as applicable designated works since it carries out the same actions as part of its business of handling designated contaminated soil and wastes. On the other hand, when a company other than a civil engineering company happens to perform operations that correspond to works for handling designated contaminated soil and wastes, the probability of such works being considered as applicable designated works is low. Although laws and ordinances do not apply to works performed by other employers, it is preferable for the employers to implement the necessary measures based on No. 2-2 of the Guideline.

No.	Text (Guideline)		Questions	Answers
21	Article 2 (No. 2 under a designated dose rate)	Applicability	When a postal delivery worker or a courier delivery worker temporarily enters a business office that continues business operations on an exceptional basis inside the areas in which the residents are not permitted to live (3.8 to 9.5 μSv/h), would the delivery worker's entry correspond to works under a designated dose rate?	The operation of motor vehicles and incident works such as loading and unloading by postal delivery or courier delivery workers correspond to works under a designated dose rate, provided the dose rates of the places of loading/unloading exceed 2.5 μSv/h and the duration of their stay at locations whose rates exceed 2.5 μSv/h totals 40 hours or more per month. The act of simply passing through an area whose rates exceed 2.5 μSv/h may be treated as not applicable to works under a designated dose rate due to the limited duration of the stay.
22	Article 2 (No. 2 under a designated dose rate)	Applicability	When a conductor riding in a bus used for the temporary return of residents: (1) gets on the bus outside the restricted area; (2) drops off residents inside the restricted area; (3) stands by inside a building within the restricted area for a certain period of time (assuming the indoor dose rates are less than 2.5 μSv/h); (4) takes residents onboard inside the restricted area; or (5) drops off residents outside the restricted area, would these operations correspond to works under a designated dose rate?	When the conductor's time spent outside the vehicle during the ride is short, the operations come under "motor vehicle operations and incident loading/unloading works, etc." stated in No. 2 (2) of the Guideline. Such operations correspond to works under a designated dose rate only when the bus is expected to stay for a total of more than 40 hours per month at locations where the rates exceed 2.5 μSv/h. It is advisable to implement decontamination and other measures of areas around the bus stops to minimize workers' exposure as much as rationally possible.
23	Article 2 (No. 2 under a designated dose rate)	Applicability	Would conducting a security patrol in a motor vehicle within an area of responsibility inside the restricted area (when patrol personnel would not leave the vehicle unless they detect something abnormal) correspond to works under a designated dose rate?	Security patrols whose time spent outside the motor vehicle is short fall under the operation of motor vehicles and incident works such as loading and unloading, etc. stated in No. 2 (2) of the Guideline. In these cases, such works correspond to works under a designated dose rate only when the duration of their stay at locations whose rates exceed 2.5 μSv/h totals 40 hours or more per month.
24	Article 3 (No. 3-3)	Exposure dose limit	In reference to dose limits over 5 years, what would the dose limit in mSv until 31 December 2016 be for an employer who starts the business of decontamination and related works on 1 June 2012?	Such an employer must implement dose control with the assumed dose limit at "20×(4+(7÷12))=91.67mSv" because the period remaining until 31 December 2016 is 4 years and 7 months.

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25	Article 3 (No. 3-3)	Exposure dose limit	When the same employer engages in works at the Fukushima Daiichi Nuclear Power Plant and other sites of decontamination and related works, which date would be regarded as the beginning of the "year" as stated in "50 mSv per year"? The employer's sites to which the Ionizing Radiation Ordinance apply adopt 1 April as the commencement date while the Ionizing Radiation Ordinance for Decontamination regards 1 January as its commencement date. Which of the dates takes precedence?	In principle, 1 January is adopted by employers who conduct decontamination and related works as the commencement date of the "year" as defined in provisions on dose control. However, employers who conduct both radiation works under the Ionizing Radiation Ordinance and decontamination and related works under the Ionizing Radiation Ordinance for Decontamination may adopt the date of commencement for the dose control of their primary work. Specifically, employers' sites that conduct radiation works as their primary work, and conduct decontamination and related works additionally, may adopt 1 April as their commencement date in their dose control.
26	Article 5 (No. 3-2 (4)	Internal exposure measure-ment	The provisions say that an internal exposure test should be taken when values exceeding 10,000 cpm are recorded in a nasal smear test as part of the screening test. Where can the test be taken?	Internal exposure tests for workers are undertaken at J Village (TEPCO), Fukushima Rosai Hospital (from January 2013) and other institutions. The test can also be taken at other medical institutions, etc. so the decision on the location of test should be made by obtaining information in advance from the Labour Bureau or the test orderer.
27	Article 5 (No. 3-2 (5)	Judgment on the appli-cability to work under high dust concent-ration	In determining whether work corresponds to work under high dust concentration, is it correct to assume the work does not correspond to work under high dust concentration if the area is moisturized (by sprinkling water)?	The assumption for works under high dust concentration is that the works are carried out under dry conditions. While high dust concentrations are not typically observed under moist conditions, it is necessary to check that the area has been moisturized properly. The parts below the surface often remain dry even when the surface appears moist. So when conducting soil stripping or concrete scraping works, there is a need to assume that high dust concentration conditions may occur except when the soil and wastes are confirmed to have become moist to the depth of stripping.
28	Article 5 (No. 3-2 (6), Annex 4)	Internal exposure screening test	Regarding measurements with a dust-proof mask for screening, should the measurement be taken on the filter parts? When the mask has two suction openings, can the combined value for each filter be used?	Measurements with dust-proof masks should be conducted on the filter parts. For masks that have more than one suction opening, it is necessary to measure them all and base the judgment on the filter that produced the highest cpm value (the values are not to be added).

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29	Article 5 (No. 3-2 (6), Annex 4)	Internal exposure screening test	How should the nasal smear test be conducted?	To conduct a nasal smear test, insert a commercially available single-use cotton swab into the nostril, roll it over the nostril inner surface several times, remove it, let it dry, and measure the radioactive level using a GM counter for surface contamination the same as in the case with conventional surface contamination. For details, please refer to the video materials prepared by the Ministry of Health, Labour and Welfare.
30	Article 5 (No. 3-2)	Dose measure-ment	It is stated that an internal exposure measurement should be taken once every 3 months when the nasal smear test shows readings that exceed 1,000 cpm on several occasions. In making a judgment on several occasions, is it acceptable to take the sum total of 10,000 cpm and deduce that 10,000 cpm÷1500 cpm≒6 times when the reading is 1,500 cpm? Does the period of time matter? Should the judgment be made on several occasions per month, per 3 months, per 6 months or during the work period?	Since the internal exposure measurement by the nasal smear test is a simplified method of measurement, it is not suited to precise calculations. When the reading exceeds 1,000 cpm on several occasions within 3 months, an internal exposure measurement should be taken once every 3 months.
31	Article 5 (Annex 5)	Measure-ment/ evaluation of average ambient dose rate	How should the judgment on the scale of dispersion be made in ambient dose rate measurements?	Farmland and other places where uniform conditions spread over a large area are assumed to have no dispersion. There is a need to judge that so-called living areas (places with buildings, structures, rivers, trees, etc. where people are living) have large dispersions in the dose rate. As for forests, the dispersion is assumed to be uniform in places where similar trees and plants are planted evenly. The rates are not assumed to be uniform in places that offers a wide variety of trees and plants, land gradation, etc.
32	Article 5 (No. 3-2)	Dose rate measure-ment	When the scope of works spans long distances, is it correct to assume that the exposure dose control on workers should only be conducted on workers engaged in works in "hot spots" and similar areas? Or should dose control be conducted on all workers engaged in the relevant operations?	It is necessary to measure the ambient dose rates of the site area (per 1000m^2) based on Annex 5 of the Guidelines to determine the applicability of the Ionizing Radiation Ordinance for Decontamination.
33	Article 5 (No. 3-2)	Dose rate measure-ment	When measurements are taken on a representative worker, the values notified to each worker are inherently imprecise because not all workers necessarily work for the same number of days. How should this issue be managed?	When conducting a simplified measurement on a representative worker, the radiation exposure dose measured on each of the representative workers' working day is regarded as the worker's radiation exposure dose. Evaluation should be made by tallying those values.

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34	Article 5 (No. 3-2)	Dose rate measure-ment	Are there problems with using relatively low-priced overseas products for personal dosimeters for measuring external exposure dose rate, survey meters for radiation measurement, and other devices?	It is necessary to use products that meet the Japan Industrial Standard (JIS standard) for personal dosimeters and survey meters for radiation measurement that are calibrated at least once a year.
35	Articles 6 and 21 (No. 3-4)	Records of dose measure-ment and medical examination	The provisions say that the employers of decontamination and related works shall measure the exposure dose rate of workers for decontamination and related works, etc. and hand the records over to an institution designated by the Minister of Health, Labour and Welfare after keeping the data for 5 years. What is the name of this institution? Is it correct to assume that this institution is the same as the one to which exposure dose control records are submitted when an employer of decontamination workers discontinues its business operations?	The designated institution is the Radiation Effects Association (an institution designated under the Ionizing Radiation Ordinance). Records for business discontinuance should be submitted to the same institution.
36	Articles 6 and 21 (No. 3-4)	Records of dose measure-ment and medical examination	There are concerns over the maintenance of workers' radiation exposure dose records when a medium- or small-sized business receives order for the works. In such cases, is it acceptable to hand the records over to the organization for the maintenance of business records for designated decontamination and related works immediately after the completion of the relevant works?	While it is possible to hand the records over to the institution, the employer's obligation to keep the records for 5 years from the completion of works or until workers engaged in said works are terminated from these works will not be exempted. Employers who decides to discontinue their business must hand over their records.
37	Article 7 (No. 4-1)	Preliminary survey	The unit used to describe the deposition of cesium-134 and cesium-137 as obtained by airborne monitoring and released by the Ministry of Education, Culture, Sports, Science and Technology is Bq/m^2. The unit adopted in the provisions for decontamination and related works by the Ministry of Health, Labour and Welfare, on the other hand, is Bq/kg. Are there conversion formulas, etc. to link the two units?	Due to dependency on the conditions of radioactive material penetration, it is generally difficult to convert Bq/m^2 into Bq/kg or vice versa.
38	Article 7 (No. 4-1)	Preliminary survey	Is it acceptable to employ the results of preliminary surveys conducted by the orderer (municipality) based on Article 7 of Ionizing Radiation Ordinance for Decontamination?	Results of the surveys conducted by the orderer may be used when all items listed in the respective provisions of Section 1, Article 7 of Ionizing Radiation Ordinance for Decontamination are implemented. The average ambient dose rate and radioactivity concentration of contaminated soil and wastes of the site of decontamination and related works must have been derived using the methods designated by the Minister of Health, Labour and Welfare.

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39	Article 7 (No. 4-1)	Preliminary survey	The "Radioactive Material Monitoring Surveys of the Water Environment" conducted by the Ministry of the Environment show the results of measurement of radioactivity concentration in rivers, soil, etc. Can these measurement results be used to estimate the radioactive concentration around nearby work areas?	It is necessary to conduct a measurement because it is generally difficult to judge whether the radioactivity concentration in the river or soil has been concentrated by rainwater and also whether uniformity can be ensured in such areas, unlike in ~~a~~ farmland.
40	Article 7 (No. 4-1)	Preliminary survey	What are the levels and standards required for the equipment used to measure radioactivity concentration and for the person conducting the measurement?	The equipment must meet the JIS standard, be calibrated at least once a year and its instructions must be in Japanese, among other requirements. The person conducting the measurement must have the knowledge and experience equivalent to or higher than those who have taken the special education.
41	Article 7 (No. 4-1)	Preliminary survey	When measuring the radioactivity concentration of contaminated soil prior to ~~a~~ ground drilling work in a living area to see whether the work corresponds to works for handling designated contaminated soil and wastes, should the sample be taken at a depth of 3-5cm from the earth's surface, or at a depth of actual drilling as shown in Annex 4?	As shown in Annex 4 of the Guideline, the sample for measurement must be taken at the actual drilling depth.
42	Article 9	Operation leader	Is it possible for an operation leader to double as a staff member in charge of radiation administration, a health officer, or a safety and health promoter?	Double job designations are permitted so long as carrying out their responsibilities does not interfere with the performance of operations.
43	Article 10 (No. 4-4) +B49	Submis-sion of work notifica-tion	The Article 10 of the Ionizing Radiation Ordinance for Decontamination states the submission of a work notification is required when conducting works of decontamination, etc. The Guideline, however, requires the submission of such a notification only when conducting works of decontamination, etc. at work areas where the ambient dose rate exceeds 2.5 μ Sv/h. Is it correct to assume that the submission of a work notification is not necessary when conducting decontamination and related works based on the Guideline at work areas where the ambient dose rate is below 2.5 μ Sv/h ?	The works of decontamination and related works, etc., in which the submission of a notification is mandated under Article 10, are confined to sites where the ambient dose rate exceeds 2.5 μ Sv/h under Section 2, Article 5 of the Ionizing Radiation Ordinance for Decontamination. There is no obligation, therefore, to submit a notification for works conducted at sites whose ambient dose rate is below 2.5 μ Sv/h.

No.	Text (Guideline)		Questions	Answers
44	Article 10 (No. 4-4)	Submis-sion of work notifica-tion	It is stated that the work notification based on Article 10 of the Ionizing Radiation Ordinance for Decontamination "must be submitted to the Director of the Labour Standards Inspection Office which has jurisdiction over the location of the relevant business site." To which office should the notification be submitted: (1) the Labour Standards Inspection Office which has jurisdiction over the location of the employer's establishment; or (2) the Labour Standards Inspection Office which has jurisdiction over the location of the work site?	The notification must be submitted to the Labour Standards Inspection Office which has jurisdiction over the location of the relevant local office when the company has a local office and where systematic labour management is being provided at the relevant site because the site would then be regarded as the business site. In other cases, the notification must be submitted to the Labour Standards Inspection Office which has jurisdiction over the location of the business establishment or other immediate, higher-ranking business sites. Basically, its treatment is the same as the plan notification based on Article 88 of the Occupational Safety and Health Act (please refer to No. 601-2 of Labour Standards Bureau Notification dated 16 September 1988 for application units).
45	Article 10 (No. 4-4)	Submis-sion of work notifica-tion	It is stated that the work notification based on Article 10 of the Ionizing Radiation Ordinance for Decontamination must be submitted by the primary employer as defined in Section 1, Article 15 of the Occupational Safety and Health Act. Therefore, is it correct to assume that an employer who directly receives an order for decontamination and related works from the orderer (municipality) should submit the notification only when relegating parts of the works to a subcontractor (in the presence of a relevant subcontractor)? The Guideline defines the primary employer as the ~~a~~ party who directly accepts work from the orderer.	The submission of a work notification was mandated because it would be difficult for the Labour Standards Inspection Office to grasp the work areas due to the nature of the work as the work areas shift from one place to another in a short time. In view of the objective, employers -- even those with no relevant subcontractor -- must submit a work notification to the party who directly places the order for the work.
46	Article 10 (No. 4-4)	Submis-sion of work notifica-tion	Among the decontamination and related works conducted at special decontamination areas, there are cases where the "average ambient dose rate of the work area" exceeds 2.5 μ Sv/h when conducting decontamination works at "hot spots" or similar areas due to the small size of the work area. Is it correct to assume that a work notification is required in such cases?	A work notification must be submitted for works conducted in areas whose average ambient dose rate exceeds 2.5 μ Sv/h as calculated by the method stipulated by the Minister of Health, Labour and Welfare as provided in Section 2, Article 5 of the Ionizing Radiation Ordinance for Decontamination. The method of calculating the average dose rate provided in Section 2, Article 5 of the Ionizing Radiation Ordinance for Decontamination is based on Article 2 of the Public Notice No. 468, Ministry of Health, Labour and Welfare (partially revised on 1 July 2012).
47	Article 13 (No. 5-2)	Use of containers	Are there any standards or restrictions concerning the material (polyethylene is commonly used) and size of the sandbags that hold the removed substances?	Although there is no clear set standard for this, a 45-liter size sandbag is used in a simulation that determines the method of simplified measurement. It is preferable to use a sandbag that can hold 45 liters or less.

No.	Text (Guideline)		Questions	Answers
48	Article 13 (No. 5-2)	Storage	What about the final disposal of the contaminated soil, sand, plants, etc.? The method adopted at present is a simplified one that involves the scraping the soil on the surface and burying the contaminated substances underground. Who is going to manage the contaminated soil and wastes? Would it not become difficult to tell where the contaminated soil and wastes were buried after about 10 years? Should not some kind of indication be required even for the case of temporary storage? For instance, when filling sandbags with contaminated soil, sand, plants, etc. and storing them, they should be put in sandbags that differ in design, etc. from ordinary sandbags (※prevention of illegal dumping, etc.)	When storing contaminated soil and wastes whose radioactivity concentration exceeds 10,000 Bq/kg, the substances in principle must be placed in a container. Furthermore, the storage area must be clearly marked with a sign and fences, etc. set up to prohibit the entry of all except those concerned.
49	Articles 14 and 15 (No. 5)	Contamin-ation inspection	When conducting decontamination and related works in an area where the average ambient dose rate is basically below 2.5 μ Sv/h and where people live near the work area, is it necessary to conduct measures to prevent contamination such as contamination inspection of workers leaving the site and items taken out of the site?	Contamination inspection measures must be implemented from the perspective of preventing the spread of contamination even if the ambient dose rate is low. This is because contaminated soil and wastes with concentration levels that exceed 10,000 Bq/kg can be registered in soil near the earth's surface, in sediments in eaves trough or in soil and wastes where rainwater collects. (Note: It is extremely difficult to ensure that workers engaged in the decontamination work of identifying and removing highly radioactive contaminated soil and wastes do not come in contact with contaminated soil and wastes with concentration levels that exceed 40Bq/cm^2. Also, in practical terms, it is difficult to identify those who are at the highest risk of contamination)

No.	Text (Guideline)		Questions	Answers
50	Articles 14 and 15 (No. 5-3)	Implement-ation of contamin-ation inspection	What kind of dosimeter is suitable for contamination inspection, and where can it be obtained?	Domestic GM counters (such as the TGS series by Hitachi Aloka Medical, Ltd.) are commonly used for contamination inspection. NaI scintillator-type dosimeters may also be used as long as they meet the JIS standards and can measure surface dose density (Bq/cm^2). When purchasing a NaI scintillator-type dosimeter for this purpose, a device designed for "surface contamination inspection" must be selected since many of these dosimeters are designed for ambient dose rate measurement and not surface contamination inspection.
51	Articles 14 and 15 (No. 2-9)	Contamin-ation inspection of materials	Section 9 (2), Article 2 of the guidelines on decontamination and related works says, "Regarding motor vehicles.... parts other than the tires such as the vehicle interior, rear body of the vehicle, etc. must be decontaminated when they are shown to have radioactive levels that exceed the contamination limit as a result of contamination inspection." Can this sentence be interpreted to mean that parts other than the tires (such as vehicle interior, rear body of the vehicle, etc.) should be decontaminated when their radioactive levels exceed the contamination limit? In that case, would the regulation also apply to the engine interior (such as air cleaners)?	The purpose of the contamination inspection is to prevent the spread of contamination through human contact, etc. and stop the movement of contaminated items into uncontaminated areas. All parts that normally come into human contact except the tires, therefore, must be inspected. Regarding engine interior and other parts that normally do not come into human contact, measurement should be conducted on the radiator, air cleaner and other engine components when the measurements of parts that can be measured from outside such as engine inlet, etc. are close to the reference value. When their measurements exceed the reference value, decontamination of such parts is recommended.

No.	Text (Guideline)		Questions	Answers
52	Article 16 (No. 5-5)	Protective equip-ment	Can heavy cotton work gloves (*gunte*) be used for the cotton gloves prescribed?	Thin (lightweight) cotton gloves, and not heavy cotton work gloves (gunte), should be worn. Considering that rubber gloves are usually worn on top of cotton gloves, wearing heavy cotton work gloves in place of lightweight cotton gloves would be cumbersome and reduce workability.
53	Article 19 (No. 6-2)	Special education	When a person who has received special education for decontamination and related works as stipulated in provisions prior to the revision engages in works handling designated contamination, etc., is it possible to apply Article 37 of the Occupational Safety and Health Act?	It is possible to apply the Article and omit the special education if the person has sufficient knowledge and experience.

No.	Text (Guideline)		Questions	Answers
54	Article 19 (No. 6-2)	Special education	At present, the Federation of Labour Standards Associations and Japan Construction Occupational Safety and Health Association plan to offer practical training on Ionizing Radiation Ordinance for Decontamination. The plan is to teach three types of operations, in sessions each lasting 1.5 hours, as practical training. How many hours of instructions should be offered in total? Also, there are plans to independently teach ways to handle radiological equipment or the method of wearing a face mask. How should the time spent on these instructions be treated? (Instructions on the handling of heavy machinery may be carried out by the employer or omitted in the presence of qualified personnel). When simultaneously conducting practical training on works for handling designated contaminated soil and wastes, how many hours of instruction should be offered for the item that was added after the revision?	It is stipulated that instructions lasting at least 1.5 hours must be given as part of practical education for special education on decontamination and related works for each of the following: (1) decontamination and related works on the soil and wastes; (2) works concerning the collection, etc. of removed soil; and (3) works concerning the collection of contaminated wastes. The scope of the subjects common to (1), (2) and (3) above are: the handling of dosimeters; monitoring of dose equivalent rate from external radiation; contamination prevention measures; inspection of the condition of physical contamination, etc. and contamination removal; and handling of protective equipment (hereinafter referred to as "handling, etc. of dosimeters"). It is stated that workers approved as having sufficient knowledge and skills on all or parts of the special education subjects may be exempted from taking the subject courses in question. When providing education on practical subjects of the three types of specified works, therefore, there is no need to teach the same content over and over again. The decision on how much time should be allotted to which part of the practical subjects is to be made by the employer depending on the actual condition of operations. Also, it is difficult to set a uniform time frame when simultaneously teaching practical subjects for the three types of specified works. However, one yardstick would be 1 hour for the common parts and 30 minutes for other parts, which would result in a total of about 2.5 hours (1 hour + 30 min. + 30 min. + 30 min.). Education on subjects in other areas (handling of machinery, etc. used, etc.) may also be omitted if the worker has sufficient knowledge and skills. Omission of common parts is also possible for practical subjects on works for handling designated contaminated soil and wastes. For subjects that cannot be omitted, there is a need to set aside sufficient time for education.
55	(No. 6-1)	Education of operation leaders	Is it imperative for the operation leader to receive special education for operation leaders, even when conducting contamination and related works in an area where the ambient dose rate is generally 2.5 μ Sv/h or less?	The Ionizing Radiation Ordinance for Decontamination stipulates that the command of operation must be exercised by a person who has the capability to implement the relevant works even in areas with a low ambient dose. For this reason, the command of operation must be done by a person who has received the education for operation leaders as stated in the guidelines on decontamination and related works or someone who has an equivalent level of knowledge and experience.

No.	Text (Guideline)		Questions	Answers
56	(No. 6-1)	Education of operation leaders	The qualifications for lecturers who provide education to operation leaders are not specified. Is it acceptable to provide in-house education instead of taking seminars by an external organization by entrusting instruction to the company's own employees, etc. who have the capability to teach the education subjects? This may include employees who have completed the foreman's education and special education for decontamination and are qualified as a ground drilling operation supervisor. Furthermore, is it correct to assume that ~~a~~ persons with such capabilities have the competence to perform operations as an operation leader without having to receive education for this purpose?	A person with sufficient knowledge and experience is qualified to teach as a lecturer. Education for operation leaders may also be omitted if workers have sufficient knowledge and experience.
57	(Annex 7)	Special education of operation leaders and workers	Would a person who has completed the education for operation leaders qualify as a lecturer of special education on decontamination and related works as specified in Annex 8 of the guideline? What are the requirements for a lecturer providing the special education on decontamination and related works and education of operation leaders?	As in the case for ordinary special education, special education may be provided by anyone who has sufficient knowledge and experience on the subject. Teaching may also be consigned to an external lecturer. This also applies to lecturers of the operation leader education. The content of operation leader education differs from that of special education. For this reason, operation leaders will need to take both courses, or have sufficient knowledge and experience in both subjects.
58	Article 20 (No. 7-1)	Medical examination	Is it possible to omit the special medical examination at the time of employment or upon reassignment to the relevant work when conducting decontamination and related works in an area whose average ambient dose rate is generally below 2.5 μSv/h and the annual dose rate is clearly shown to be less than 5 mSv?	When conducting decontamination and related works, the special medical examination must be carried out at the time of employment or upon reassignment to the relevant work regardless of the average ambient dose rate of the work areas. However, the periodic medical examination may be omitted when the annual dose rate does not exceed 5 mSv and the physician agrees that items other than interviews are unnecessary.
59	Article 20 (No. 7-3 (3))	Reporting of medical examination results	When the same business conducts works at the TEPCO Fukushima Daiichi Nuclear Power Plant and other sites of decontamination and related works, which form should be used for the special medical examination: the one provided in Ionizing Radiation Ordinance or the one in Ionizing Radiation Ordinance for Decontamination?	The application of provisions on dose control is decided according to the principal work at each business site. Specifically, the Ionizing Radiation Ordinance form is used if the principal work is radiation work and the Ionizing Radiation Ordinance for Decontamination is used if it is decontamination.

No.	Text (Guideline)		Questions	Answers
60	(No. 8)	Safety supervisor, radiation adminis-trator	Are there qualifications or requirements for safety supervisor for the primary employer in No. 8 of the guidelines and for the radiation administrator for employers of decontamination and related works?	Regarding safety supervisor, radiation administrator and radiation control personnel, any person who has the sufficient knowledge and experience to perform such jobs is eligible. It is preferable, however, to select a radiation administrator among the holders of national licenses on radiation (such as Radiation Protection Supervisor and Nuclear Fuel Handling Supervisor) or those who have taken lectures, etc. on radiation administration provided by specialized educational institution, etc. (lectures by the Japan Atomic Energy Agency and the Japan Radioisotope Association, etc.)
61	(No. 8)	Safety supervisor, radiation adminis-trator	Is it acceptable for a health officer or safety and health promoter to double as a radiation control officer, who is appointed by the employers of businesses engaged in decontamination and related works?	Serving in a dual capacity is acceptable so long as the person has sufficient knowledge and experience to perform the jobs concerned.
62	(No. 8)	Systematic control	Workers who work for a relevant subcontractor are defined as fixed-term contract workers whose place of work may change from day to day. Instructions to such workers are given by the relevant subcontractor, who is the employer. For this reason, it is difficult in reality for the primary employer to exercise systematic control over individual exposure dose control. Is systematic control necessary?	The difficulty of exercising individual exposure control in construction and decontamination businesses is understandable. However, the primary employer is responsible for exercising control over workers including those employed by relevant subcontractors to enable each relevant subcontractor to follow the Ionizing Radiation Ordinance for Decontamination.
63	(No. 8)	Occupa-tional safety and health manage-ment	Regarding the eligibility requirements stated in No. 8-3 of the guidelines on decontamination and related works, must the radiation control officer be a national license holder or must he/she have taken lectures, etc. by a specialized educational institution, etc.? What are the levels assumed in lectures by specialized institutions?	National license holders or persons who have taken lectures, etc. provided by specialized educational institutions, etc. (radiation control training, etc. provided by the Japan Atomic Energy Agency, or the Japan Radioisotope Association, etc.) are preferable. However, even in the absence of persons who have taken such lectures, etc., it is necessary to appoint a radiation control officer who will be engaged in the following tasks: (1) Dose measurement (No. 3-2) (2) Exposure dose limit (No. 3-3) (3) Recording, etc. of dose measurement results (No. 3-4) (4) Implementation of contamination inspection (No. 5-3) (5) Implementation of measures to prevent contamination (No. 5-4) (6) Prevention of physical and internal contamination (No. 5-5) (7) Implementation of measures, etc. for maintaining and improving health of emergency workers at the TEPCO Fukushima Daiichi Nuclear Power Plant (No. 8-4)
64	(No. 8)	Safety supervisor, radiation adminis-trator	A contractor who receives orders for decontamination and related works in the absence of a relevant subcontractor is not classified as a "principal employer." Is it correct then to assume that the appointment of a general safety and health manager and radiation administrator, as stipulated in No. 8-1, 2 in the guidelines on decontamination and related works, is not required in such a case?	There is no need to appoint a general safety and health manager if there is no relevant contractor, but the appointment of a radiation administrator is mandatory.

No.	Text (Guideline)		Questions	Answers
65	(No. 8)	Occupa-tional safety and health manage-ment	In the case of principal employer, is it correct to assume that the operation leader comes under the command of the general safety and health manager?	The operation leader is a worker employed by the relevant contractor, and general safety and health manager is a worker employed by the principal employer, which means they are not in a relationship based on chain of command (if they were, the contract would then be deemed fraudulent). The general safety and health manager will be in charge of liaison and coordination with the relevant subcontractor, establishment of councils and providing guidance and assistance to the relevant subcontractor.
66	(No. 8)	Occupa-tional safety and health manage-ment	If there is no relevant subcontractor, is it correct to assume that the radiation control officer, health officer or general safety and health manager come under the command of the operation leader?	The radiation control officer, health officer and general safety and health manager are specialized jobs (staff positions) in charge of managing the work environment or health management of the entire business site whereas the operation leader assumes the command of on-site operations (line position). The two groups of managers work together but they are not in a relationship based on a chain of command.