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Comment On: NRC-2009-0279-0098
Radiation Protection; Advance Notice of Proposed Rulemaking

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Comment on FR Doc # 2015-06244

Submitter Information

Name: Anonymous Anonymous

General Comment

See attached file(s)

Attachments

CNL-15-120 Part 20



CNL-15-120

June 19, 2015

Ms. Annette L. Vietti-Cook
Secretary
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
Attn: Rulemaking and Adjudications Staff

Subject: **Comments on the NRC Advance Notice for Proposed Rulemaking for 10 CFR Part 20, "Radiation Protection" (*Federal Register* Vol. 79, 143), dated July 25, 2014 - Docket ID NRC-2009-0279)**

Dear Ms. Vietti-Cook:

On July 25, 2014, an Advanced Notice for Proposed Rulemaking (ANPR) was published in Federal Register Notice (79 *Fed. Reg.* 143) and docketed (Docket ID NRC-2009-0279) to revise Nuclear Regulatory Commission (NRC) regulations in Title 10, Code of Federal Regulations (CFR) Part 20, "Radiation Protection." The NRC requested comments by November 24, 2014.

On November 20, 2014, the NRC extended the comments due date to March 24, 2015 (79 *Fed. Reg.* 69065). On March 18, 2015, the NRC again extended the due date for comments to June 22, 2015 (80 *Fed. Reg.* 14033).

Tennessee Valley Authority (TVA) agrees with the Nuclear Energy Institute's (NEI), comments, dated March 24, 2015, submitted on behalf of the nuclear energy industry. The NEI comments recommend that the NRC not make the changes proposed in the ANPR because they are unnecessary and provide no cost-benefit, while providing little to no improvement in the health and safety of workers, public or the environment.

The TVA concurs with the Commission's position as stated in the NRC SRM-SECY-08-0197 that current radiation protection standards provide adequate protection of the health and safety of workers, the public and the environment.

The TVA also concurs with the Commission that the recommendations contained in the International Commission on Radiation Protection (ICRP) Publication 103 (2007) proposes measures that go beyond what is needed to provide adequate protection of the health and safety of workers, the public and the environment.

The nuclear industry's current operating practices protect workers, the public and the environment beyond what is required by current regulatory requirements in a number of ways that are discussed in NEI's comments, including:

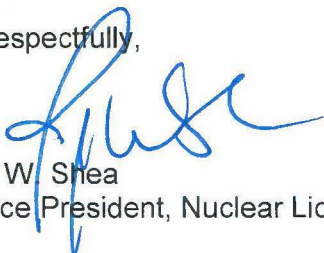
- Effectively demonstrating the As-Low-As-Reasonably-Achievable (ALARA) principle with respect to worker exposure;
- Maintaining plant system operating limits to a fraction of the federal limits; and
- Operating facilities such that doses to members of the public from plant effluents are less than 0.1% of what the average person receives each year from all sources of radiation.

Furthermore, TVA believes that the cumulative effect of regulation (CER) resulting from the changes described in the ANPR for 10 CFR Part 20 will place substantial resource burdens on nuclear energy licensees with little or no additional protection of occupational workers or the public. This burden will be further compounded if the proposed changes by the U.S. Environmental Protection Agency (EPA) in the February 2, 2014 ANPR for 40 CFR Part 190 and the soon to be proposed changes anticipated to be published in an ANPR for Part 50, Appendix I, are imposed on licensees.

In summary, TVA recommends that no changes be made to the existing regulations because (1) existing standards remain protective of occupational workers, public health as well as the environment; (2) the recommendations contained in ICRP Publication 103 propose measures that go beyond what is needed to provide adequate protection; (3) the nuclear industry's current operating procedures and practices protect occupational workers, the public and the environment far beyond the regulatory requirements for the uranium fuel cycle; (4) changing regulations would place significant human and monetary resource burdens on licensees and; (5) there will be a significant cumulative effect of regulation, together with proposed changes to U.S. EPA's 40 CFR Part 190 and NRC's 10 CFR Part 50 Appendix I, on the industry with little or no benefit to worker and public health safety, and the environment.

If there are any questions, or if additional information is required, please contact Fred Mashburn at (423)751-8817.

Respectfully,



J. W. Shea
Vice President, Nuclear Licensing

cc : The Honorable Stephen G Burns, Chairman, NRC
The Honorable Kristine L. Svinicki, Commissioner, NRC
The Honorable William C. Ostendorff, Commissioner, NRC
The Honorable Jeff Baran, Commissioner, NRC
Mr. Mark A. Satorius, EDO, NRC
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