June 13, 2016

MEMORANDUM TO: Raymond Lorson, Director
Division of Reactor Safety
Region I

Anthony Gody, Director
Division of Reactor Safety
Region II

Kenneth O'Brien, Director
Division of Reactor Safety
Region III

Anton Vegel, Director
Division of Reactor Safety
Region IV

FROM: Christopher Miller, Director ***/RA/***
Division of Inspection and Regional Support
Office of Nuclear Reactor Regulation

SUBJECT: FINAL RESPONSE TO TASK INTERFACE AGREEMENT 2014-09, RECORDING AND REPORTING OF OCCUPATIONAL RADIATION DOSE (ML15187A388)

By memorandum dated February 12, 2016 (ML15187A388), NRR provided Region III with the final response to TASK INTERFACE AGREEMENT (TIA) 2014-09, "RECORDING AND REPORTING OF OCCUPATIONAL RADIATION DOSE." This TIA was established to provide guidance needed to disposition an inspection issue at the Palisades Nuclear Plant concerning an acceptable minimum occupational dose that must be recorded in an individual's dose record and reported to the NRC.

Several questions have been raised since the TIA response was issued. The enclosure to this memorandum is intended to provide additional guidance on how to implement the conclusions in the TIA response.

Enclosure:
As stated

CONTACT: Roger Pedersen, NRR
301-415-3162

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DISTRIBUITON: RPedersen NRR/DRA UShoop NRR/DRA JNoggle RI BBonser RII
HPeterson RIII HGepford RIV

ADAMS ACCESSION No.: ML16137A098

OFFICE	ARCB:DRA	ARCB:DRA	DRA:DD	DIRS:DDD	DIRS:DD
NAME	RPedersen	UShoop	JGiitter	SHelton	CMiller
DATE	05 / 18 / 16	05 / 26 / 16	05 / 27 / 16	06/ 03 / 16	06 / 13 / 16

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TASK INTERFACE AGREEMENT (TIA) 2014-09, "RECORDING AND REPORTING OF OCCUPATIONAL RADIATION DOSE

The specific question asked by RIII was, "What is an acceptable minimum threshold for recording levels and/or reporting levels for occupational dose?" The simple answer is that Title 10 of the *Code of Federal Regulations* (10 CFR) 50.2106 and 20.2206 require reactor licensees to make records of, and annually report to the NRC, the results of individual monitoring required by 10 CFR 20.1502, respectively. There is no provision for a minimum value for recording or reporting occupational dose. However, if the monitoring was not required by 10 CFR 20.1502, these recording and reporting requirements do not apply. The pertinent question is whether or not the monitoring was required by 20.1502.

Staff positions applicable to whether a measured, or calculated, dose was the result of monitoring required by 10 CFR 20.1502 include:

1. The determination of whether 10 CFR 20.1502 requires monitoring of an individual worker is a prospective one (i.e., a prospective determination of the likely outcome of radiation exposure situations throughout the year). Once a determination is made that individual radiation monitoring is required by 20.1502, it is not appropriate to retrospectively alter that determination if the results of the monitoring do not exceed the 20.1502 criteria. See answer to Question 43 in NUREG/CR-6204, "Questions and Answers Based on Revised 10 CFR 20."
2. A licensee may voluntarily monitor an individual in exposure situations where a documented prospective determination concluded monitoring is not required (see Regulatory Guide 8.34, C.1.4). The results of this voluntary monitoring (i.e., monitoring of individuals within the scope of this prospective determination) are not subject to the recording and reporting requirements (unless the monitoring results indicates the prospective determination was faulty or the criteria in 20.1502 was exceeded). However, a licensee may also voluntarily record and/or report the results of this monitoring (or establish criteria for when to record voluntary monitoring).
3. A dose calculation, or other monitoring, performed in response to an operational occurrence, that resulted in an exposure outside the scope of a prospective determination, is required monitoring per 20.1502.

In applying these positions, it is important to recognize the following;

1. If the licensee did not document a prospective determination for a monitored exposure situation (or if the exposure was outside the scope of the associated prospective determination), it must be assumed that the monitoring was required (i.e., necessary to demonstrate compliance with Part 20).
2. The fact that the monitoring was the result of a dose calculation does not in itself make it required monitoring. It could still be voluntary monitoring that verified the assumptions of the applicable prospective determination (e.g., calculated internal dose calculations may verify that radioactive intakes from routine exposures, and small unplanned intakes, are

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within the values predicted by the prospective determination that concluded that monitoring was not required).

3. A licensee choosing to record and/or report the results of voluntary monitoring does not automatically make it (or any subsequent monitoring) required monitoring.
4. The fact that a monitoring (required or voluntary) result was recorded by the licensee does not in itself indicate the exposure had greater safety significance. (i.e., that any performance deficiency that led to, or contributed to, the exposure was of more-than-minor significance).
5. The more-than-minor question should be based on whether the performance deficiency impacted the licensee's ability to meet the ROP cornerstone objective (i.e., provide adequate protection by maintaining the individual's dose within 10 CFR 20 requirements). This is also the case where the performance deficiency was a failure to record and/or report the results of required monitoring. The Palisades performance deficiency was dispositioned by RIII as a minor violation.