

REGULATORY ANALYSIS

DRAFT REGULATORY GUIDE (DG-8056) “INSTRUCTIONS FOR RECORDING AND REPORTING OCCUPATIONAL RADIATION DOSE DATA”

(Proposed Revision 4 of Regulatory Guide 8.7, dated November 2016)

1. Statement of the Problem

The U.S. Nuclear Regulatory Commission (NRC) is considering a Revision 4 to Regulatory Guide (RG) 8.7, “Instructions for Recording and Reporting Occupational Radiation Dose Data,” and is issuing this draft Revision 4 as draft regulatory guide (DG), DG-8056, “Instructions for Recording and Reporting Occupational Radiation Dose Data” for public comment.

The NRC received a letter from the Nuclear Energy Institute (NEI) after issuing RG 8.7 (Revision 3), stating that Revision 3 included a change in the staff position that was not included in the draft guide for Revision 3 that was published for public comment as DG-8030. In Revision 3 to RG 8.7, the staff modified a long-standing NRC staff position that the criteria to determine whether personal monitoring pursuant to 10 CFR Part 20.1502 by a licensee is required is independent of exposures received at any other place of employment.

The NRC staff reassessed the interpretation of the requirements in 10 CFR Part 20, “Standards for Protection Against Radiation,” and proposes to revise RG 8.7, so that it reflects essentially the same agency position as set forth in Revisions 1 and 2 to RG 8.7 and issue it as Revision 4.

2. Objective

The objective of this regulatory action is to revise the RG to reinstate the long-standing staff positions for implementing the requirements of 10 CFR 20.1502, whereby in determining the need to monitor the occupational dose of a given individual, licensees are not required to consider the amount of prior occupational dose that individual received during the current monitoring year. Also, other minor clarifications are made in Revision 4.

3. Alternative Approaches

The NRC staff considered the following alternative approaches:

1. Not to revise RG 8.7 Revision 3;
2. Withdraw RG 8.7 Revision 3; and
3. Revise RG 8.7 Revision 3.

Alternative 1: Not to Revise Regulatory Guide 8.7

Under this alternative, the NRC would not issue additional guidance. If the NRC does not take action to revise RG 8.7, licensees would use the guidance in Revision 3. Revision 3, however, modified a staff position that is included in Revisions 1 and 2 to RG 8.7 regarding the

consideration of prior occupational dose when determining the need for required monitoring in accordance with 10 CFR 20.1502. The guidance in Revision 3 could unnecessarily increase the cost (compared to Revisions 1 and 2 and the proposed Revision 4) to licensees for occupational monitoring determinations. Also, the public was not given the opportunity to provide comments on the change of the staff position that was included in Revision 3.

Alternative 2: Withdraw Regulatory Guide 8.7

Under this alternative, the NRC would withdraw RG 8.7. This alternative would eliminate the staff's guidance regarding reporting of dose that is included in Regulatory Guide 8.7, which would leave licensees without guidance, particularly regarding reporting of information using the most recent versions of NRC Forms 4, "Cumulative Occupational Dose History," and NRC Form 5, "Occupational Dose Record for a Monitoring Period." The staff does not have a recognized process for withdrawing specific revisions for RGs, but also considered doing this. However, an action to withdraw only Revision 3 could be misperceived as withdrawing all revisions to RG 8.7, since that is the normal process. In addition, Revision 3 still provides adequate protection to public health and safety, in that it allows a conservative option for those licensees who want to consider prior occupational dose when making 10 CFR 20.1502 determinations.

Alternative 3: Revise Regulatory Guide 8.7

Under this alternative, the NRC staff considered issuing a new revision, Revision 4, to RG 8.7. Revision 4 sets forth the same staff position as Revisions 1 and 2 of RG 8.7 with respect implementing the requirements of 10 CFR 20.1502 and retains the Revision 3 guidance concerning the use of the most recent versions of NRC Forms 4 and 5. This alternative provides the most up-to-date staff positions to licensees.

4. Conclusion

Based on this regulatory analysis, the NRC staff concludes that a revision of RG 8.7 is warranted. The proposed action will delineate the latest staff positions to licensees regarding occupational dose monitoring of individuals and providing information for NRC Forms 4 and 5.