MEMORANDUM TO: Margaret M. Doane  
Executive Director for Operations

FROM: Annette L. Vietti-Cook, Secretary

SUBJECT: STAFF REQUIREMENTS – SECY-17-0006 – INTERIM STAFF GUIDANCE ON EVALUATING CHEMICAL EXPOSURES AT FUEL CYCLE FACILITIES

October 29, 2018

The Commission has disapproved the issuance of the interim staff guidance (Enclosure 1 to SECY-17-0006).

Licensees and applicants are required to limit the risk of acute chemical exposures, including dermal and ocular exposures, in a manner consistent with the performance requirements of 10 CFR 70.61. Because licensees and applicants have sufficient process safety information, such as toxicity data, to assess the consequences of acute dermal and ocular chemical exposures, the Commission finds it unnecessary to require licensees and applicants to propose an additional quantitative exposure standard specific to dermal and ocular exposures. Therefore, the Commission has disapproved the establishment of such a requirement, either through modification of existing regulations or incorporation into other regulatory guidance documents. This direction does not conflict with the NRC’s Memorandum of Understanding with the Occupational Safety and Health Administration or the regulations in 10 CFR Part 70.65(b).


cc: Chairman Svinicki  
Commissioner Baran  
Commissioner Burns  
Commissioner Caputo  
Commissioner Wright  
OGC  
CFO  
OCA  
OPA  
ODs, RAs, ACRS, ASLBP (via E-Mail)  
PDR