UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SECRETARY

October 29, 2018

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

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).

The staff should await further direction arising from Commission action on SECY-18-0042 (Draft Final NUREG/BR-0058, "Regulatory Analysis Guidelines of the U. S. Nuclear Regulatory Commission") and SECY-18-0049 (Management Directive and Handbook 8.4, "Management of Backfitting, Issue Finality, and Information Collection") prior to developing or issuing any further revisions to agency internal procedures and guidance governing backfit provisions.

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