



NUCLEAR MANAGEMENT AND RESOURCES COUNCIL

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Ref. EDO 7115

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Executive Vice President &  
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December 12, 1991

Mr. James M. Taylor  
Executive Director for Operations  
U. S. Nuclear Regulatory Commission  
Washington, DC 20555

Dear Mr. Taylor:

As a follow-up to your conversation with Byron Lee regarding our request for a one year extension of the implementation date for compliance with the revised 10 CFR Part 20 from January 1, 1993 to January 1, 1994, the following additional information is provided:

1. Our analysis of the need for the proposed regulatory guides was provided to your staff and discussed in a meeting on June 25, 1991 (enclosed). Based on input we received in reviewing your draft guides, the conclusions in our analysis remain unchanged.
2. The following draft regulatory guides have been recently issued for public comment (date of issuance in the Federal Register are in parenthesis):
  - DG-8004, "Radiation Protection Programs for Nuclear Power Plants" (56 FR 56671, November 6, 1991)
  - DG-8005, "Assessing External Radiation Doses from Airborne Radioactive Materials" (56 FR 58256, November 18, 1991)
  - DG-8006, "Control of Access to High and Very High Radiation Areas at Nuclear Power Plants" (56 FR 56671, November 6, 1991)
  - RG 8.25, Rev. 1, "Air Sampling in the Workplace" (56 FR 52078, October 17, 1991)
  - RG 8.7, Rev. 1, "Instruction for Recording and Reporting Occupational Radiation Exposure Data" (FR notice pending)

Note that our earlier analysis questioned the need for three of these guides (DG-8004, -8005, -8006). These areas are adequately covered by existing NRC and industry guidance. Expenditure of resources in these areas appears unwarranted.

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3. The following draft regulatory guides have not been issued and are essential to effective implementation of the revised regulations. They are:
  - DG-800?, "Criteria and Procedures for Summation of Internal and External Radiation Doses"
  - RG 8.9, Rev. 1, "Interpretation of Bioassay Measurements"
  - DG-800?, "Dose to the Embryo/Fetus"
  - RG 1.109, Rev. 2, "Calculation of Annual Doses to Man From Routine Releases of Reactor Effluents for the Purpose of Evaluating Compliance With 10 CFR Part 50, Appendix I"  
[Note: The NRC staff is not planning to change this guide to a methodology consistent with the revised Part 20 until EPA changes 40 CFR 190 to this methodology.]
4. The following draft regulatory guides have not been issued and are important to address changes to programs, but should be addressed after the guides in paragraph 3 above are completed:
  - DG-800?, "Planned Special Exposures"
  - RG 8.11, Rev. 1, "Applications of Bioassay for Uranium"
  - RG 8.29, Rev. 1, "Instruction on Health Risks from Occupational Radiation Exposure"

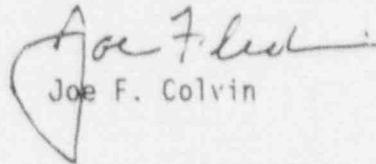
As Mr. Lee discussed, we are concerned with the staff's concept of keeping the present implementation date but using the first year of the actual compliance as a "trial" period to work out the issues. In our efforts and comments to support the changes to 10 CFR 20, we agreed with the Commission on the need to effectively implement the extensive changes necessary. The need for final regulatory guidance in these areas is essential to effective completion of this effort. This is an area where we believe we can achieve a high degree of standardization if implemented properly and where we have the opportunity to provide stability and predictability to the regulatory process. The lack of clear guidance can result in inconsistent interpretations between regions and licensees and has a high probability of causing false starts and undermining employees' confidence in the overall radiation protection programs. This would adversely impact excellent programs that are in place with demonstrated and effective mechanisms to maintain occupational dose as low as reasonably achievable. These concerns were discussed in detail with your staff and are reflected in Enclosure A. The implementation date change to January 1, 1994, would also allow the industry to be in line with the Agreement State compliance date and thereby eliminate any unnecessary confusion.

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We are also planning to sponsor workshops to assist the industry in implementing the revised regulations. The timing of the workshops depends on the availability of the final NRC guidance. As we have discussed with your staff, we are encouraging NRC participation to provide a dialogue and a consistent interpretation by the industry and NRC. As you know, this format has worked very well in areas such as operator requalification, fitness-for-duty, and access authorization.

We hope this additional information will be helpful. If you have any questions regarding the enclosure or need additional information, please call me or Byron Lee.

Sincerely,

  
Joe F. Colvin

JJM  
Enclosure