



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

SEP 17 1985

MEMORANDUM FOR: Daniel R. Muller, Assistant Director
for Radiation Protection, DSI

THRU: Frank J. Congel, Chief
Radiological Assessment Branch, DSI

Oliver D. T. Lynch, Jr., Leader
Radiation Protection Section
Radiological Assessment Branch, DSI

FROM: Richard J. Serbu, Task Manager
Radiation Protection Section
Radiological Assessment Branch, DSI

SUBJECT: TRIP REPORT - SEPTEMBER 12, 1985 MEETING AT
INPO TO DISCUSS COORDINATION PLAN ACTIVITIES

On Thursday, September 12, 1985, NRC representatives met with INPO representatives to discuss a variety of Coordination Plan activities being conducted under the NRC/INPO Memorandum of Agreement. As part of these discussions, activities related to Coordination Plan No. 3, "Coordination Plan for NRC/INPO Radiological Protection Activities" were discussed from approximately 12:00 pm to 1:30 pm.

Principals in the discussions related to the Coordination Plan for Radiological Protection Activities were as follows:

NRC

- . William Russell, Acting Director
Division of Human Factors, NRR
- . Richard J Serbu, Task Manager
Division of Systems Integration, NRR
- . Dan Jones, HFPP Manager
Division of Human Factors, NRR
- . Phil McKee, Chief
Operating Reactor Programs Branch, IE

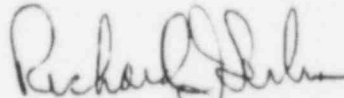
INPO

- . Pete Lyon, Director
Division of Radiological
Protection & Emergency
Preparedness
- . William Kindley, formerly
Deputy Director, DRPEP;
now a staff assistant to
the INPO President
- . Bob Heublein, Section Manager
Radiological Protection

Discussions centered around the following topics:

1. Management and working level contacts and responsibilities for Radiation Protection in NRR following reorganization.
2. Revision/continuation of the Coordination Plan for Radiological Protection Activities.
3. Information exchange.
4. Further actions related to Coordination Plan.
5. INPO concerns over "ALARA" rulemaking, R.G. 8.XX.

A brief summary of these discussions is provided as Enclosure 1. Additionally, I spent approximately 1/2 hour with Bob Heublein and Tom Mitchell discussing differences in data compilation which were noted during our ACRS presentations on July 31, 1985.



Richard J. Serbu, Task Manager
Radiation Protection Section
Radiological Assessment Branch
Division of Systems Integration

Enclosure:
As stated

cc: R. Bernero
W. Russell
J. Sniezek
M. Federline
D. Jones
P. McKee

ENCLOSURE 1

1. Management and working level contacts and responsibilities for radiation protection/Coordination Plan activities in NRR following reorganization:

Responsibility within NRR for Coordination Plan activities will probably shift to the Division of Human Factors Technology, and health physics expertise will be provided to this group to conduct the working level activities. The present Task Manager for Plan #3 will probably carry the issue through to resolution, which is being revised to 11/85 from 9/85. Radiation Protection activities will probably be tied into existing maintenance and training program efforts (in DHFS) under Hal Booher. The history of the Coordination Plan from NRC and INPO perspectives was also briefly reviewed.

2. Revision/continuation of the NRC/INPO Coordination Plan for Radiological Protection Activities:

The staff has reviewed INPO's draft of a revised Coordination Plan #3, however, present management review of NRC relations with INPO regarding access to and exchange of information may result in a policy decision which will affect the agreement. It appears that while the two-year evaluation period within the body of the Plan is close to term, the plan itself may be extendable as is. This should be a matter for NRC management review and further discussion with INPO.

3. Information exchange:

Parallels in the needs, efforts and problems of information sharing were discussed by NRC and INPO staff members. INPO personnel stressed the need for independence from the regulatory process, while NRC stressed the need to be able to verify, on the public record, industry efforts which affect regulatory matters. Formality in information exchange was discussed, such as whether the INPO ACRS presentation of July 31, 1985 constituted an on-the-record release of radiological protection data adequate for NRC decisions regarding radiation protection rulemaking. Dan Jones (NRR/DHFS) and Phil McKee (IE/ORPB) noted related experience under other Coordination Plans.

4. Further NRC actions related to the Coordination Plan:

The NRC Task Manager (Serbu) noted some of the remaining action plan items under Task Action Plan III.D.3.1 and outlined other actions being considered as a result of the two-year evaluation program. These included:

- a) Slippage of III.D.3.1 close-out date to 11/85
- b) Preparation of a Commission Paper from NRC compiled and trended data
- c) Current effort to compile and analyze radiological data from NRC sources

- d) Pending effort to establish an NRC radiological data base
- e) Consideration of a revised Coordination Plan
- f) Assignment of radiological controls functions and responsibilities under NRR reorganization

5. INPO concerns over "ALARA" rulemaking and R.G. 8.XX

INPO personnel expressed concern that even after a successful industry effort under the Coordination Plan evaluation program, that "ALARA" Rulemaking would be pursued and the implementing R.G. 8.XX issued. NRC staff noted the complex process of rulemaking and the historical events which generated the 10 CFR 20 rule in its present form (with the proposed "ALARA" rule), and noted that unnecessary regulation - as determined under this Coordination Plan - would probably not be pursued. INPO also noted their development of "Guidelines for Radiological Protection at Nuclear Power Stations" and indicated that NUMARC has endorsed industry efforts at further improvement in radiation protection. NRC staff will review this document in terms of "equivalency" to the NRC's R.G. 8.XX ALARA implementation form and content document.