



# **Advance Notice of Proposed Rulemaking 10 CFR Part 20**

**NRC Public Meeting - October 16, 2014**

## **Issue 5 – Metrication**

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## Current Format

- **10 CFR Part 20 provisions list traditional units first followed by SI units in parenthesis**
- **Appendix values are only in traditional units only**
- **NRC's Metrication Policy provides for SI units listed first followed by traditional units in parenthesis**

## Current Record Keeping Requirements

- **10 CFR 20.2101(a) requires licensees to use traditional units for records**
- **10 CFR 20.2101(b) allows records with SI units in parentheses following the traditional units**
- **10 CFR 20.2101(c) requires information recorded on shipping manifests to be in SI units or both SI and traditional units**

## Direction and Proposal

- **Commission Direction:**
  - Disapproved the elimination of traditional units from NRC regulations.
  - Both traditional and SI units should be maintained.
- **Proposal:**
  - Implement NRC's Metrication Policy Statement – SI units first followed by traditional units in parenthesis

## Selection of Values for Appendix

- **Current Appendix B in Traditional Units**
- **Conversion from Traditional Units of activity (microcuries) to SI value (becquerel) not an integer**
- **Precedence of 10 CFR Part 37, Appendix A:**
  - **NRC stated that the SI units provided the regulatory standard and the traditional units were provided for practical use only**
  - **Curie values given to 3 significant figures to minimize differences**

## Questions

- **Q5-1 Will promulgation of amendments to the 10 CFR Part 20 regulations with dose limits and other measurements shown in dual units, with the SI units shown first, followed by the traditional units in parentheses, cause an undue burden or hardship upon any licensee or class of licensees?**

## Questions

- **Q5-2 Should 10 CFR 20.2101(a) be revised to allow licensees the option of providing records in SI units or in traditional units? Should licensees be allowed to provide reports in the units used in licensee records? Should licensees be required to record and report in both sets of units?**
- **Q5-3 Should the NRC amend the appendices for 10 CFR part 20 to show values in SI units only, in traditional units only, or in both sets of units?**

## Summary

- **Comments will be accepted until November 24, 2014**
  - Federal e-Rulemaking portal at <http://www.regulations.gov> under Docket ID NRC-2009-0279
  - email to [Rulemaking.Comments@nrc.gov](mailto:Rulemaking.Comments@nrc.gov)
  - fax to Secretary, U.S. Nuclear Regulatory Commission, 301-415-1101
  - mail to Secretary, U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, ATTN: Rulemakings and Adjudications Staff

<http://www.nrc.gov/about-nrc/regulatory/rulemaking/potential-rulemaking/opt-revise.html>