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February 28, 2000

MEMORANDUM TO: Edwin F. Fox Jr., Chief
Emergency Preparedness and Radiation Protection Section
Operator Licensing, Human Performance & Plant Support Branch
Division of Inspection Program Management
Office of Nuclear Reactor Regulation

FROM: Stewart Schneider, Health Physicist */RA/*
Emergency Preparedness and Radiation Protection Section
Operator Licensing, Human Performance & Plant Support Branch
Division of Inspection Program Management
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF FEBRUARY 19, 2000, PUBLIC MEETING WITH THE
NUCLEAR ENERGY INSTITUTE (NEI) REGARDING SIGNIFICANCE
DETERMINATION PROCESS TOOLS FOR ASSESSING RADIATION
PROTECTION PROGRAMS

On February 9, 2000, representatives of the Nuclear Energy Institute (NEI) met with representatives of the Nuclear Regulatory Commission (NRC) at the NRC's offices in Rockville, Maryland.

The purpose of this meeting was to continue the process of meeting with stakeholders to review and revise the occupational and public radiation safety significance determination process (SDP) and inspection procedures that were published in the *Federal Register* on July 26, 1999 (64 FR 40394). The meeting began with NRC staff discussing the "radiation safety strategic area" action items from the January 19, 2000 public meeting. Based on discussions and input from NEI on these items, appropriate changes will be made to the performance indicators (PIs) and SDPs.

NRC provided a handout of proposed changes to the Transportation SDP (see Attachment 1) to the representative from NEI for their consideration. Also discussed was the radioactive material control program section of the Public Radiation Safety SDP. The discussion focused on the decision diamond for the five events which could result in a white finding. NRC and NEI agreed to continue discussing this matter.

There was significant discussion between NRC staff and NEI regarding the ALARA component of the Occupational Radiation Safety SDP. It was agreed that the first three diamonds in the ALARA component would be removed from the SDP since they were essentially a prefilter for entering this SDP.

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NEI discussed proposed clarifying changes to their PI manual (see Attachment 2). Dialogue on this matter will continue and NRC will provide responses at future public meetings. Regarding frequently asked questions (FAQs), NRC and NEI agreed that FAQs are important and will be addressed as new questions are presented to the NRC staff. FAQs from the public workshops are available on the NRC web site.

NEI provided copies of draft preliminary data pertaining to the Occupational Radiation Safety PI for 67 nuclear power plant sites ranked by the 3-year total (see Attachment 3). Based on this preliminary data, discussion focused on the relevancy of continuing with a three year period for the cumulative assessment of PI findings or whether a shorter time frame would be more appropriate. NEI believes that 1-year is a more appropriate evaluation period.

Finally, the applicability of the Occupational Radiation Safety PI to an unintended dose in a high radiation area was discussed. NRC handed out copies of plots provided by Michael Russell (SONGS) that pertained to this issue (see Attachment 4). Mr. Russell believes that the current limiting value of 1 mSv (100 mrem) above the planned dose due to a barrier failure is not appropriate in the case of a worker in a high radiation area. In work areas where dose rates average 50 to 60 R/hr, 1 mSv (100 mrem) could be exceeded in a matter of seconds. Mr. Russell believes that it would be appropriate to have a sliding dose increment for work in a high dose rate area as opposed to the fixed value of 1 mSv (100 mrem). No consensus was reached on this matter. NRC agreed to look into this matter and continue discussion at future public meetings.

Attachment 5 provides a list of public meeting attendees. The meeting was adjourned.

Attachments: As stated

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**NEI/NRC MEETING ON INSPECTION FINDINGS IN RADIATION PROTECTION
LIST OF ATTENDEES**

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Roger Pedersen	NRC/DIPM
Steve Klementowicz	NRC/DIPM
Stewart Schneider	NRC/DIPM
James Isom	NRC/DIPM
John Lubinski	NRC/OCM/NJD
Michael Russell	Southern California Edison