

## Response to Comments - Chapter 4 - Radiation Protection

Comment No.	Source	Comment	Disposition
4.1	NEI	The proposed regulatory Acceptance Criteria are overly prescriptive and far exceed the regulatory authority granted to the NRC in 10 CFR Parts 19, 20, and 70. The Acceptance Criteria are weighted towards ensuring compliance with NRC regulatory guidelines, ANSI standards, and NCRP reports. NEI recommends that the Acceptance Criteria sections of the SRP be simplified to include only those actual regulatory requirements that are directly and specifically linked to a rulemaking, be goal-oriented, and be written with a minimum of prescriptive detail. NEI also recommended structural changes to streamline Chapter 4.	Agree in part. The Acceptance Criteria have been modified to remove some of the specific and prescriptive language. The acceptance criteria retained is needed for several reasons including: (1) to describe a way that is acceptable to the NRC in meeting its regulatory requirements, (2) to help new reviewers, and (3) to maintain uniformity and consistency among the reviewers. Chapter 4 is being completely restructured in accordance with NEI's structural streamlining recommendations.
4.2	NEI	Chapter 4, "Radiation Protection" should be revised to emphasize the role of the ISA as the cornerstone for designing the radiation protection program to the ISA.	Disagree. NRC believes that the design of the radiation protection program should be primarily based on the regulatory requirements in Part 20 and that the ISA should be reviewed, but not be the cornerstone for designing the radiation protection program.
4.3	NEI	Other than existing licensees, applicants will not be able to provide much of the information required in the present Chapter 4.	Disagree. Presently, licensees have in their license applications the majority of the information in the present Chapter 4. NRC does not believe that new applicants will be unable to provide this information.

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4.4	NEI	Chapter 4 should not require licensees to do trend analyses as part of the ALARA review since there is no regulatory requirement.	Disagree. Presently, most licenses do trend analysis of contamination levels, employee exposures, effluent releases, etc. during their annual radiation safety reviews or ALARA reviews and NRC believes licensees should continue to do these reviews. As is generally the case, alternative analyses can be proposed by the applicant or licensee.
4.5	NEI	Chapter 4 imposes specific design requirements for ventilation systems, regardless of the safety significance of such equipment in differing areas of the facility.	Agree. Chapter 4 will be revised and the specific design requirements for ventilation systems have been removed.
4.6	NEI	NEI recommends that only the principal regulatory citation(s) for each area in Chapter 4 be listed.	Agree. Chapter 4 will be revised per NEI's recommendation.
4.7	NEI	Inconsistent terminology is used in Chapter 4. For example, the terms "radiation safety program" and "radiaton protection program" are use interchangeably. NEI recommends using the latter term, i.e., radiation protection program.	Agree. Chapter 4 will be revised per NEI's recommendation.
4.8	NEI	NEI recommends adding an additional area of review entitled "Additional Program Commitments" which includes commitments to maintain radiation program records, reporting exposures in excess of Part 20 limits, etc.	Agree. Chapter 4 will be revised per NEI's recommendation.