

Chapter 4 - Radiation Protection - NRC Questions on NEI Comments

1. One of NEI's general comments is that the NRC draft SRP has "Overly Prescriptive Acceptance Criteria." Much of the prescriptive acceptance criteria relates to commitments that fuel cycle licensees presently have in their license applications and have had for many years to demonstrate compliance with Part 20. Why does NEI have concerns with these commitments?
2. Why does NEI want to delete NRC's Branch Technical Positions (BTPs) in Section 4.7, "References" when these (BTPs) have been in the fuel cycle licensee's license applications for many years and have been useful to these licensees?
3. Another of NEI's general comments concerns the "Commitments versus Prescriptive Performance Criteria." NEI states that other than for existing licensees, an applicant will be unable to provide much of the information now solicited in draft SRP Chapter 4. What information will applicants not be able to provide?
4. Another of NEI's general comments concerns "Trend Analyses." Fuel cycle licensees have been doing trend analysis as part of their annual radiation protection and ALARA program reviews for many years. Why does NEI think that trend analysis should not be included in the SRP?
5. In Section 4.4.1, "ALARA" of the draft SRP, NEI recommends deleting the "ALARA Committee." Fuel cycle licensees have had ALARA committees and they have functioned successfully for many years. Please explain why NEI does not think that fuel cycle licensees need to have ALARA committees?
6. NEI has deleted periodic radiation safety retraining. However, consensus standards (e.g. ASTM E 1168) and regulatory guides (e.g. RG 8.29) that are referenced in the training acceptance criteria section do endorse periodic retraining. Please explain why NEI wants retraining deleted from the SRP and the reasons for not including it?