

February 21, 2001

Ms. Deborah Sheppard, Executive Director
Altamaha Riverkeeper
P.O. Box 2642
Darien, Georgia 31305

SUBJECT: REPLY TO JUNE 9, 2000, LETTER TO THE NUCLEAR REGULATORY
COMMISSION

Dear Ms. Sheppard:

By letter dated June 9, 2000, to the Nuclear Regulatory Commission (NRC), you provided comments concerning the application for license renewal for Edwin I. Hatch Nuclear Plant, Units 1 and 2. One of your comments, which concerns the radiological impact of the operation of Hatch on workers and the surrounding population, was forwarded to us for resolution.

The NRC's radiation protection standards, which protect workers at nuclear power plants and people in the surrounding area, were modified and published in the Federal Register on May 21, 1991 (56 FR 23360). This amendment to Part 20 of the *Code of Federal Regulations* reflected developments in the principals and scientific knowledge underlying radiation protection that have occurred since Part 20 was originally issued. The Statement of Consideration published in 56 FR 23360 provides a thorough explanation and the basis for the new radiation protection standards.

The NRC generally follows the basic radiation protection recommendations of the International Commission on Radiation Protection (ICRP) and its U.S. counterpart, the National Council on Radiation Protection and Measurements (NCRP), in formulating basic radiation protection standards for the general population and the plant workers. In 1977, the ICRP revised the guidance for radiation exposure to the general population and the plant workers. This guidance, described in ICRP Publication 26, introduced significant modifications to existing concepts and recommendations of the ICRP and the NCRP, and these modifications were incorporated in the revised Part 20.

In adopting the basic tenets of the ICRP guidance, the NRC recognizes that, when combining dose limits with the principle of keeping all radiation exposures "as low as reasonably achievable (ALARA)," the degree of protection could be significantly greater. Because of this, ALARA is a significant element of the NRC regulations in Part 20.

Hatch, as required by Part 20, has in place a radiation protection program to ensure that radiation exposure to plant workers and the surrounding population is not only controlled below the regulatory limits, but is kept as low as reasonably achievable. The NRC monitors the licensee's performance at Hatch on a daily basis through inspections by NRC inspectors stationed at the plant and through periodic inspections by radiation protection specialists from

the Regional NRC office located in Atlanta, Georgia. These inspections allow the NRC to maintain an on-going oversight and assessment of the licensee's performance in the radiation protection area.

We believe that existing NRC regulations, which were developed using the consensus of the international scientific community and through a public-participation process, are adequate. If you believe that the NRC's requirements should be revised for any reason, you may petition the NRC to issue, amend, or repeal a rule.

We trust that this explanation is responsive to your concern. Should you have any questions or comments on this response, please call me toll-free at 1-800-368-5642.

Sincerely,

/RA/

Leonard N. Olshan, Senior Project Manager, Section 1
Project Directorate II
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

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