

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555

September 29, 1988

MEMORANDUM FOR: Victor Stello, Jr.
Executive Director for Operations

FROM: Samuel J. Chilk, Secretary

SUBJECT: STAFF REQUIREMENTS - BRIEFING ON STATUS OF
EFFORTS TO DEVELOP A BELOW REGULATORY CONCERN
POLICY, 10:00 A.M., FRIDAY, SEPTEMBER 16,
1988, COMMISSIONERS' CONFERENCE ROOM, ONE
WHITE FLINT NORTH, ROCKVILLE, MARYLAND (OPEN
TO PUBLIC ATTENDANCE)

The commission was briefed by the staff and representatives of the Health Physics Society and NUMARC on proposed options for a commission policy which establishes a generic radiation activity below regulatory concern.

Representing the Health Physics Society were:

- Dr. Lauriston S. Taylor
Past President, Health Physics Society
- Robert Alexander
President, Health Physics Society

Representing NUMARC was:

- Thomas Tipton
Division Director, NUMARC

The Commission requested the staff to raise the following issues at the International Workshop on Rules for Exemption from Regulatory control scheduled for October 17-19, 1988.

1. The need to include a collective dose criterion and possible alternatives for evaluating societal impact.
2. The possibility of limiting the activity of individual products as an alternative to use of a collective dose criterion.
3. Allowing the use of radioactive materials under NRC surveillance as an alternative to exemption exclusions.

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4. The extent to which exposures resulting from any practice should be justified and the process for making such a determination:

(a) in considering proposals for exemptions, should the Commission evaluate the social acceptability of practices?

(b) should the Commission determine a practice to be unjustified if non-radioactive alternatives exist?

The commission emphasized the importance of presenting the proposed policy in terms the general public can relate to (i.e., number of additional cancer deaths expected vs. number of mrem).

The staff should submit a paper to the Commission summarizing the activities and conclusions reached at the International Workshop, including a revised policy statement which considers the above issues.

(EDO)

(SECY Suspense: 1/27/89)

The Chairman requested his fellow Commissioners to address in their vote sheets if the staff should publish the proposed policy, SECY-88-257, for public comment prior to the International Workshop.

cc: Chairman Zech
Commissioner Roberts
Commissioner Carr
Commissioner Rogers
OGC
GPA
PDR - Advance
DCS - P1-124