

April 06, 2001

MEMORANDUM TO: William Beckner, Acting Chief  
Generic Issues, Environmental, Financial &  
Rulemaking Branch  
Division of Reactor Program Management, NRR

FROM: Joseph L. Birmingham, Project Manager/**RA**/  
Generic Issues, Environmental, Financial &  
Rulemaking Branch  
Division of Reactor Program Management, NRR

SUBJECT: SUMMARY OF MARCH 20, 2001 PUBLIC MEETING WITH THE  
NUCLEAR ENERGY INSTITUTE (NEI) ON THE SIGNIFICANCE  
DETERMINATION PROCESS IN THE RADIATION PROTECTION AREA

On March 20, 2001, NRC staff met with representatives of NEI and industry to discuss ongoing implementation of the Significance Determination Process and Performance Indicators in the radiation protection area. Attachment 1 is a list of those attending the meeting including staff members from Region IV participating via teleconference. Attachment 2 provides the papers presented by NRC during the meeting.

The meeting began with introductions and a statement that the meeting was to review industry and NRC experience in implementing the SDP for the Public and Occupational Radiation Safety Cornerstones and also to discuss the radiation safety portion of the lessons learned workshop on the reactor oversight process scheduled for March 26-28, 2001.

Steve Klementowicz, NRC, led the discussion of the public radiation cornerstone and Roger Pedersen, NRC, led the discussion of the occupational radiation cornerstone. Topics discussed included (1) SDP flowcharts being finalized by the staff to clarify the status of shipped misclassified items, (2) a proposed change to Inspection Manual Chapter IMC 069, Appendix D, "Public Radiation Safety Determination Process, and (4) a draft for comment paper on "Public Radiation Safety Cornerstone Draft Revised SDP Guidance," that would clarify SDP guidance on what would and would not be a finding in the Radioactive Material Control Portion of the SDP. The papers for these issues are in Attachment 2.

Also discussed were the proposed topics for the breakout sessions in the upcoming workshop on the Reactor Oversight Process the week of March 26, 2001. These topics are detailed in a paper, "Radiation Safety Breakout Sessions," included in Attachment 2 of this summary. The group discussed that the intent of the workshop and the breakout sessions was to provide an information exchange which would allow the industry to present proposed solutions and comments on the Public and Occupational Radiation Safety Cornerstones. Proposed topics include discussion of very hot particles and how to assess the, "As Low as Reasonably Achievable," (ALARA) program. The workshop will have a facilitated discussion of stakeholder input on NRC and industry identified issues and proposed resolutions.

Ralph Andersen, NEI asked when comments on the SDP go through stakeholder review. NRC indicated that comments are generally incorporated and issued for stakeholder input on a quarterly basis. NEI asked whether changes to the SDP would be made retroactive. NRC responded that there was not as yet a policy on this issue and that it would require staff determination. The staff discussed a concern from region inspectors that there appeared to be a lack of attention to the meteorological systems at a few facilities that were recently inspected. The staff is concerned because it is a cross-cutting issue with the Public and Emergency Preparedness Cornerstones. NEI asked how lessons learned from the 1<sup>st</sup> year of the SDP would be factored into the inspection program in terms of adjusting the inspection program level of effort. NRC commented that lessons learned are being considered in a separate effort to adjust inspection hours.

There was further discussion on the application of the SDP to ALARA. NEI asked whether ALARA is a proper adjunct of the Occupational Radiation Safety Cornerstone or should it have its own SDP. The group discussed the safety significance of ALARA and what an SDP for ALARA should accomplish. NEI also asked if collective dose is a valid measure of safety significance and pointed out that NRC traditionally set dose based on individual exposures. NRC agreed this area deserved more discussion and would be discussed at the workshop.

Having completed discussion of all items the meeting was adjourned.

Project No. 689

Attachments: As stated

cc w/atts: See next page

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**List of Attendees for March 20, 2001 Meeting**  
**Significance Determination Process for Radiation Safety Cornerstones**

<b>NAME</b>	<b>ORGANIZATION</b>
Ralph Andersen	NEI
Jamie Mellon	Exelon
Wayne Carr	Southern Company
Lee T. Thomasson	Dominion Services
Larry A. Haynes	Duke Power Company
Mike Russell	SCE
Terry Cellmer	PSEG
Steve Klementowicz	NRC/NRR/IOLB
Jim Wigginton	NRC/NRR/IOLB
Roger Pedersen	NRC/NRR/IOLB
Kathy Halvey Gibson	NRC/NRR/IOLB
Charles Hinson	NRC/NRR/IOLB
Leta Brown	NRC/NRR/SPSB
Stewart Schneider	NRC/NRR/IOLB
Joe Birmingham	NRC/NRR/RGEB
Elizabeth Smioldo	NRC/OCFO
Elmo Collins*	R-IV
Gail Good*	R-IV

\* via telephone bridge