



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

JUL 13 1994

MEMORANDUM FOR: Edward L. Jordan, Chairman  
Committee to Review Generic Requirements

FROM: Eric S. Beckjord, Director  
Office of Nuclear Regulatory Research

SUBJECT: REQUEST FOR REVIEW OF THE PROPOSED GENERIC LETTER TITLED  
"VOLUNTARY REPORTING OF ADDITIONAL OCCUPATIONAL RADIATION  
EXPOSURE DATA"

The Office of Nuclear Regulatory Research (RES) requests that the Committee to Review Generic Requirements (CRGR) review and endorse the subject proposed generic letter.

Enclosure 1 is the generic letter as proposed by the staff. The staff considers this generic letter to be Category 2.

Under the previous requirements of 10 CFR Part 20.1 through 20.602, seven classes of licensees were required to submit termination reports containing occupational radiation exposure data for the entire period of work or employment to the NRC when individuals terminated employment or a work assignment at their facilities. Thus, at the end of a worker's employment, his entire exposure record would be part of NRC's exposure database. In addition, these licensees were required to submit a statistical summary of the exposures of all individuals occupationally exposed at their facilities.

Under the new requirements of 10 CFR 20.1001 through 20.2402, which became effective on January 1, 1994, these licensees are now required to annually submit occupational radiation exposure data to the NRC for all persons occupationally exposed at their facilities, during that year, for whom monitoring is required. Termination reports are no longer required. Thus, as of April 1994 and every April thereafter, the required exposure data for employees for the previous year is to be submitted to the NRC. With this change in reporting requirements, the exposure data for current employees, from the time of their initial employment to the date of implementation of the new requirements of 10 CFR Part 20.1001 through 20.2402 would not be reported.

Complete data would only be available for employees who finished their careers prior to the new requirements or new employees who only worked under the new requirements. Complete data would not be available for any employee who worked under both the new and old reporting requirements. This gap in the radiation exposure data would limit the usefulness of the REIRS database for (1) epidemiology as described in Enclosure 2, (2) supporting decisions on the necessity and appropriateness of new regulatory requirements for occupational exposure, and (3) facilitating determinations by new employers of prior occupational exposure as required by 10 CFR 20.2104.

Edward L. Jordan

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As stated in the statement of consideration to 10 CFR Part 20.1001 through 20.2402 published in the Federal Register on May 21, 1991 (56 FR 23386) one of the goals fulfilled through the collection of this data is to ensure that the REIRS database does not lose information that would be vital to carrying out studies. Enclosure 2, a letter from Dr. John Boice, Chief, Radiation Epidemiology Branch of the National Cancer Institute, expresses his support for this voluntary data collection.

In an effort to provide complete and reliable data for the reasons stated above, the NRC staff is requesting that the seven classes of licensees included in the REIRS database provide a voluntary report of the data missed as a result of the change in regulations. This report would be requested to include the occupational radiation exposure data of licensee employees from the date of employment with that licensee to the day prior to implementation of the new requirements of 10 CFR Part 20.1001 through 20.2402. This information requested is the same as that included on NRC Form 5.

Backfit analysis was not performed because of the voluntary nature of the requested information to the NRC.

Enclosure 3, is the response to the questions contained in Section IV.B of the CRGR Charter.

A notice of opportunity for public comment on the proposed generic letter will not be published in the Federal Register because of the voluntary nature of the generic communication.

The Office of the General Counsel reviewed this proposed generic letter and has no legal objections.

The generic letter is sponsored by Bill M. Morris, Director, Division of Regulatory Applications.

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Eric S. Beckjord, Director  
Office of Nuclear Regulatory Research

Enclosures:

- 1. Proposed Generic Letter  
Titled "Voluntary Reporting  
of Additional Occupational  
Radiation Exposure Data"
- 2. Letter from Dr. John Boice, Chief  
Radiation Epidemiology Branch  
National Cancer Institute
- 3. Response to CRGR Charter Questions

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See next page

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