



UNITED STATES
NUCLEAR REGULATORY COMMISSION
ADVISORY COMMITTEE ON NUCLEAR WASTE
WASHINGTON, D.C. 20555

ACNWR-0054

PDR

May 30, 1991

The Honorable Kenneth C. Rogers
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Commissioner Rogers:

SUBJECT: REVIEW OF REGULATORY GUIDES ON REVISED 10 CFR PART 20

In response to the last question of your memorandum of April 29, 1991, we are pleased to provide the following information concerning the regulatory guides that are being developed in support of revised 10 CFR Part 20.

The plan for reviewing these guides was based on discussions between James Carroll, then Chairman of the cognizant Advisory Committee on Reactor Safeguards (ACRS) subcommittee and Dade Moeller, Chairman of the Advisory Committee on Nuclear Waste (ACNW) with input from Raymond Fraley, Executive Director, ACRS/ACNW. J. Ernest Wilkins, Jr. (ACRS) has subsequently been assigned as the Chairman of this subcommittee and has no objection to this plan of action.

Because of their significance and direct applicability to nuclear power plants, Mr. Carroll noted the ACRS intent to review four of the proposed guides. These are

1. Radiation Protection Programs for Nuclear Power Plants
2. Control of Access to High and Very High Radiation Areas in Nuclear Power Plants
3. Instructions for Recording and Reporting Occupational Radiation Exposure Data
4. Planned Special Exposures

The ACNW assumed lead responsibility for the remaining regulatory guides. A review of their titles, however, indicates that only seven relate to the control of or impact from radionuclides that might be released as a result of waste management activities or to the assessment of their associated risks. These guides, which the ACNW plans to review, are

1. Interpretation of Bioassay Measurements
2. Criteria and Procedures for Summation of Internal and External Occupational Exposures
3. Air Sampling

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4. Assessing External Radiation Doses from Airborne Radioactive Materials
5. Instructions on Health Risks from Occupational Radiation Exposures (Regulatory Guide 8.29)
6. Dose to Embryo/Fetus
7. Instructions to Pregnant Women (Regulatory Guide 8.13)

The regulatory guides that remain are

8. Preparation of Applications for Use of Sealed Sources and Devices for Performing Industrial Radiography (Appendix to Regulatory Guide 10.6)
9. Preparation of Applications for Medical Uses (Appendix to Regulatory Guide 10.8)

The ACNW plans to give these last two guides a preliminary review in order to determine if a more detailed review appears warranted.

It should be noted that both the ACRS and the ACNW will keep the other Committee informed regarding each other's activities with respect to these guides so that areas of mutual interest/concern can be coordinated, consistent with Chairman Carr's memorandum of November 6, 1989.

We trust this responds to the last question in your memorandum. Although we believe your first two questions address issues of far higher priority, we nonetheless have made plans to assist in reviewing these regulatory guides in accordance with our interpretation of SECY-91-023 (Development of Regulatory Guides for 10 CFR Part 20) and the priorities established for conduct of ACNW activities. Should you have questions concerning this response, or believe that we should handle these reviews in a different manner, we would welcome your comments.

Sincerely,



Dade W. Moeller
Chairman