



# Accident Sequences Resulting in Low Dose Consequences

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# Issues

- Is there a regulatory gap for low dose consequences?
- What is “increased radiological risk”?



# Overview

- Jurisdiction – NRC and OSHA
- Specific Regulatory Requirements
- Dominating Requirements



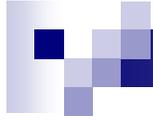
# Memorandum of Understanding between NRC and the Occupational Safety and Health Administration (OSHA)

## ■ NRC

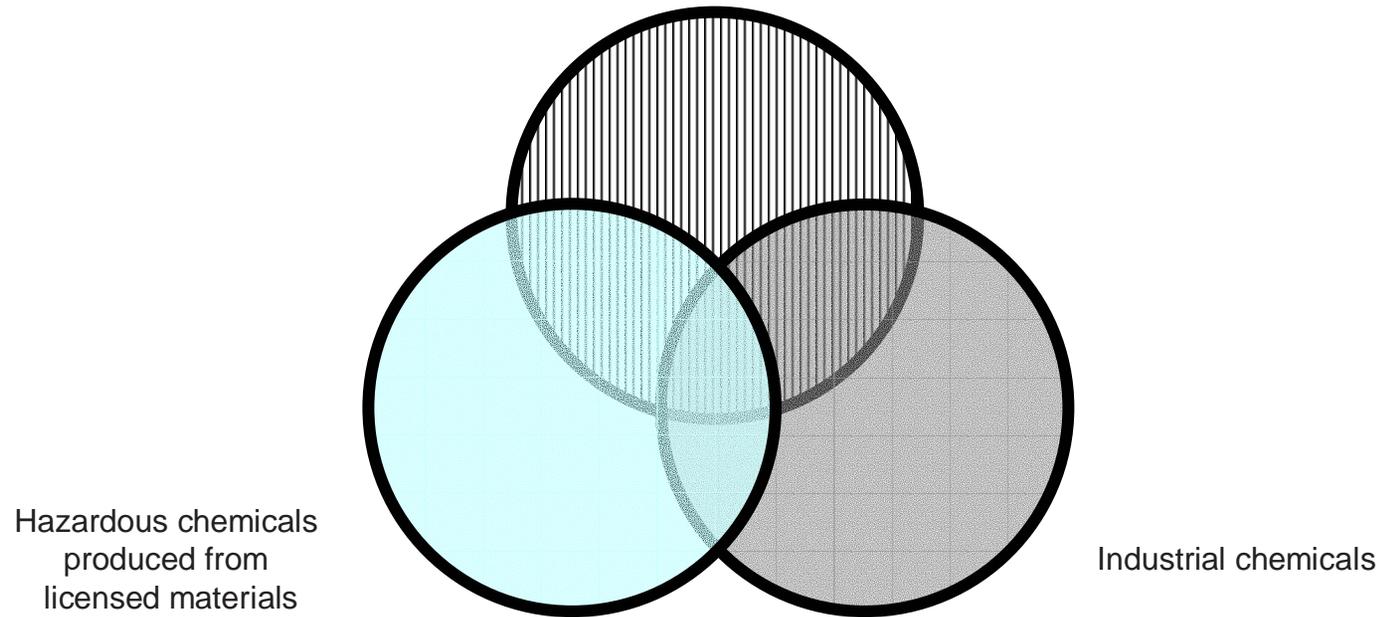
- Radiation risk produced by radioactive materials
- Chemical risk produced by radioactive materials
- Plant condition which affects the safety of radioactive materials and thus presents an increased radiation risk to workers

## ■ OSHA

- Plant conditions which result in an occupational risk, but do not affect the safety of licensed radioactive materials



## Integrated Safety Analysis Summary





# Part 20

- Covers normal operations and upset conditions
- Requires a radiation protection program
- Does not require identification of items relied on for safety



# Part 70 Subpart H

- Requires that all accident sequences and consequences be identified
- Requires mitigation or prevention of those consequences that exceed the performance requirements
- Requires identification of items relied on for safety



## 10 CFR 70.22(i)(1)(ii)

- Requires an emergency plan for responding to the radiological hazards of an accidental release of SNM and to any associated chemical hazards directly incident thereto
- Emergency response activities may overlap with administrative controls used to meet performance requirements of Subpart H



# Low Dose Consequences

- The requirements of Part 20, Part 70 Subpart H and 10 CFR 70.22(i)(1)(ii) overlap and leave no regulatory gap.

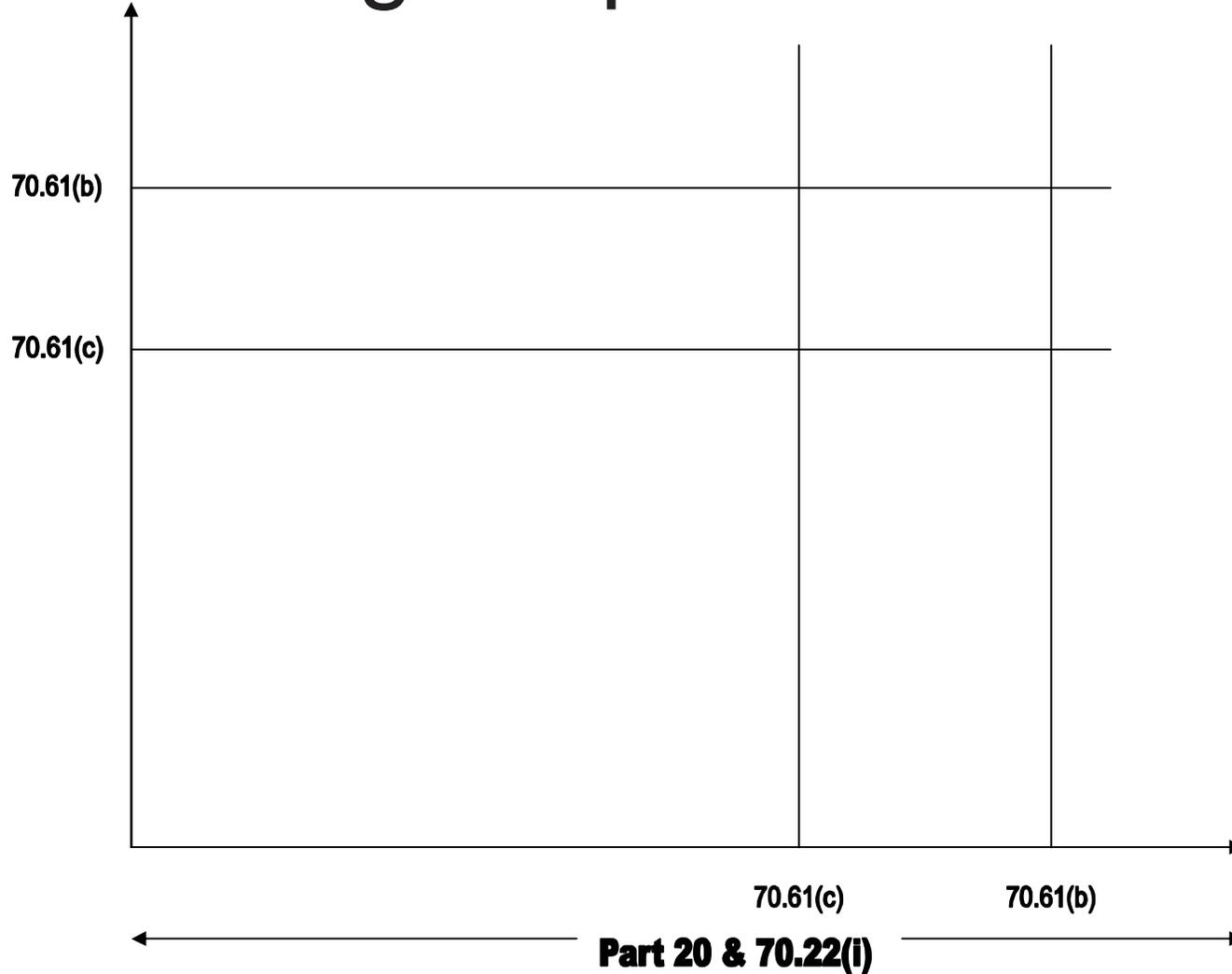


# Increased Radiological Risk

- Applies to facility hazards
- Is meant to ensure all hazards that could have a radiological impact are evaluated

# Dominating Requirements

C  
H  
E  
M  
I  
C  
A  
L



Radiological