

990042

From: Roger Pedersen, *NRR*
To: David Vito *RT*
Date: Tue, May 11, 1999 2:08 PM
Subject: ALLEGATION RESPONSE INPUT

Dave, as we discussed on the phone earlier today, here is a short discussion of the NRC policy applicable to the issue of heat stress vs. ALARA and the use of bubble suits at licensed facilities.

The NRC policy on whether industrial hazards can be considered in the 10 CFR 20.1702 required assessment is discussed in Question & Answer (Q&A) number 387 documented in NUREG/CR - 6204, "Questions and Answers Based on Revised 10 CFR Part 20", dated May 1994. In essence the answer to Q&A 387 states that the regulation does require that respiratory protection devices be used only if an assessment shows that doing so will result in the total effective dose equivalent (TEDE) to be as low as reasonably achievable. However, "[a] reduction in TEDE is not reasonably achievable if an attendant increase in the worker's industrial health and safety risk would exceed the benefit." The application of the ALARA principle is not intended to require licensees to ignore factors other than radiation in providing for worker safety. This NRC policy is available on the NRC Public web home page at [<http://www.nrc.gov/NRC/NMSS/HP/QA/qa387.html>].

CC: Fiona Tobler, Gregory Cwalina, Jean Lee

6-2

r