

September 19, 2005

MEMORANDUM TO: Eileen McKenna, Acting Program Director  
Reactor Policy and Rulemaking Program  
Division of Regulatory Improvement Programs  
Office of Nuclear Reactor Regulation

FROM: Joseph L. Birmingham, Project Manager */RA/*  
Reactor Policy and Rulemaking Program  
Division of Regulatory Improvement Programs  
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF SEPTEMBER 15, 2005, PUBLIC MEETING ON  
RADIATION PROTECTION PROGRAM GUIDANCE FOR A COMBINED  
OPERATING LICENSE UNDER 10 CFR PART 52

On September 15, 2005, Nuclear Regulatory Commission (NRC) staff met with a representative of the Nuclear Energy Institute (NEI) in a public meeting at NRC headquarters in Rockville, Maryland, to continue discussion of radiation protection program topics that an applicant should address when applying for a Combined Operating License (COL) under 10 CFR Part 52. In particular, the meeting focused on the milestones to be included in a schedule for program implementation. A list of meeting attendees is provided in Attachment 1. The draft meeting handout of the radiation protection program implementation milestones provided by NEI for discussion at the meeting is Attachment 2. The updated radiation protection program implementation milestones with the comments from the meeting incorporated is Attachment 2. The final draft of Chapter 12.5, Radiation Protection Program, for input into NEI 04-01, "Draft Industry Guideline for Combined License Applicants Under 10 CFR Part 52," with the updated implementation milestones and NRC editorial comments is available in ADAMS under Accession # ML052620107.

After introductions, the group discussed NRC comments on the proposed radiation protection program implementation milestones. Ralph Andersen, of NEI, agreed to incorporate the comments and provided a copy for inclusion in the meeting summary. Additionally, the NRC staff provided editorial comments for inclusion in the final draft of Chapter 12.5. A copy of the final draft of the chapter is available in ADAMS under Accession # ML052620107.

After completing the above discussion, and as there were no public comments, the group adjourned.

Project No. 689  
Attachment: As stated

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List of Attendees for September 15, 2005  
Meeting on Radiation COL Issues

NAME

ORGANIZATION

Roger Pedersen  
Charles Hinson  
Joe Birmingham  
Ralph Andersen  
Kirsi Alm-Lytz

NRC\DIPMIPSB  
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NRC\DRIP\RPRP  
Nuclear Energy Institute  
STUK

Draft for discussion

Chapter 12.5 Radiation Protection Program Implementation Milestones

1. Prior to receiving any non-exempt radioactive sources under this license, and thereafter, when such sources are possessed under this license, the following will be in place:
  - a. Organization – A radiation protection supervisor and at least one radiation protection technician, each selected, trained and qualified consistent with the guidance in Regulatory Guide 1.8.
  - b. Facilities – A facility or facilities to support the receipt, storage and control of non-exempt radioactive sources in accordance with 10 CFR 20.1801, 20.1802, and 20.1906.
  - c. Instrumentation and Equipment – Adequate types and quantities of instrumentation and equipment will be selected, maintained and used to provide for the appropriate detection capabilities, ranges, sensitivities and accuracies required for the types and levels of radiation anticipated for the receipt, storage, control, and use of non-exempt sources possessed under this license to conduct surveys and monitoring in accordance with 10 CFR 20.1501 and 20.1502.
  - d. Procedures – Procedures will be established, implemented and maintained sufficient to maintain adequate control over the receipt, storage, and use of non-exempt sources possessed under this license and as necessary to assure compliance with 10 CFR 19.11 and 19.12 and 10 CFR 20 Subparts B, C, D, F, G, I, J, L, and M.
  - e. Training – Initial and periodic training will be provided to individuals responsible for the receipt, control or use of non-exempt radioactive sources possessed under this license in accordance with 10 CFR 19.12 and consistent with the guidance in Regulatory Guides 1.8, 8.13, 8.27, and 8.29.
2. Prior to receiving reactor fuel under this license, and thereafter, when reactor fuel is possessed under this license, radiation monitoring will be provided in accordance with 10 CFR 50.68 or 10 CFR 70.24, in addition to the elements specified under item 1, above.
3. Prior to initial loading of fuel in the reactor, the program described in this section will be fully implemented, with the exception of the organization; facilities, equipment and instrumentation; and procedures necessary for the transfer, transport and disposal of radioactive materials in accordance with 10 CFR 20, Subpart K, and 10 CFR 71.
4. Prior to initial transfer, transport and disposal of radioactive materials, the organization; facilities, equipment and instrumentation; and procedures will be in place as necessary to assure compliance with 10 CFR 20, Subpart K, and 10 CFR 71.5.

Attachment 2

Chapter 12.5 Radiation Protection Program Implementation Milestones  
(With meeting comments incorporated)

1. Prior to initial receipt of by-product, source, or special nuclear materials (excluding Exempt Quantities as described in 10 CFR 30.18), and thereafter, when such radioactive materials are possessed under this license, the following radiation protection program elements will be in place:
  - a. Organization – A radiation protection supervisor and at least one (1) radiation protection technician, each selected, trained and qualified consistent with the guidance in Regulatory Guide 1.8.
  - b. Facilities – A facility or facilities to support the receipt, storage and control of non-exempt radioactive sources in accordance with 10 CFR 20.1801, 20.1802, and 20.1906.
  - c. Instrumentation and Equipment – Adequate types and quantities of instrumentation and equipment will be selected, maintained and used to provide for the appropriate detection capabilities, ranges, sensitivities and accuracies required for the types and levels of radiation anticipated for the receipt, storage, control, and use of non-exempt sources possessed under this license to conduct surveys and monitoring in accordance with 10 CFR 20.1501 and 20.1502.
  - d. Procedures – Procedures will be established, implemented and maintained sufficient to maintain adequate control over the receipt, storage, and use of radioactive materials possessed under this license and as necessary to assure compliance with 10 CFR 19.11 and 19.12 and 10 CFR 20, commensurate with the types and quantities of radioactive materials received and possessed under this license.
  - e. Training – Initial and periodic training will be provided to individuals responsible for the receipt, control or use of non-exempt radioactive sources possessed under this license in accordance with 10 CFR 19.12 and consistent with the guidance in Regulatory Guides 1.8, 8.13, 8.27, and 8.29.
2. Prior to receiving reactor fuel under this license, and thereafter, when reactor fuel is possessed under this license, radiation monitoring will be provided in accordance with 10 CFR 50.68, in addition to the radiation protection program elements specified under item 1, above.
3. Prior to initial loading of fuel in the reactor, the program described in this section will be fully implemented, with the exception of the organization, facilities, equipment, instrumentation, and procedures necessary for transferring, transporting and disposing of radioactive materials in accordance with 10 CFR 20, Subpart K, and applicable requirements in 10 CFR 71. In addition, at least one (1) radiation protection technician, selected, trained and qualified consistent with the guidance in Regulatory Guide 1.8, will be onsite and on duty when fuel is initially loaded in the reactor, and thereafter, whenever fuel is in the reactor.
4. Prior to initial transfer, transport and disposal of radioactive materials, the organization, facilities, equipment, instrumentation, and procedures will be in place as necessary to assure compliance with 10 CFR 20, Subpart K, and applicable requirements in 10 CFR 71.

