



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20548

Central Files AA38-2
Don't Call

OFFICE OF THE
EXECUTIVE DIRECTOR
FOR OPERATIONS

12/88

Bruce Potvin
DOW 21-1

Note to: Bill Morris, RES (lead)
Dick Cunningham, NMS S.
Frank Congel, NRR (info)

- SECY is trying to set up a briefing for the TA's on SECY 88-315 (see attached)
- It obviously covers a lot of territory and fundamentals. More than one session may be called for.
- Please scope out how & who would respond and how sessions might be divided (RES lead). Is Dec 15 OK for first session?
- Bill, please give me a call when you have scoped.

Jim Blaha

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MEMORANDUM FOR: Janice Dunn-Lee
Maria Lopez-Utin
Margaret Federline
Gail Marcus
Jack Heltemes

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FROM: Jack Guttman

SUBJECT: COMMISSIONERS' ASSISTANTS MEETING RELATING TO
SECY-88-315, ' REVISION OF 10 CFR PART 20,
'STANDARDS FOR PROTECTION AGAINST RADIATION" '

A Commissioners' Assistants meeting on the Subject SECY paper has been scheduled for 10:00 a.m., Thursday, December 15, 1988, at the 18th floor Executive Conference Room, One White Flint North.

An outline of the staff's presentation is as follows:

- o Detailed but simplified explanation of annual and committed dose, including the analytical methods.
- o Discussion of how dose commitment is incorporated in the present Part 20 for controlling internal doses (Ref.: pgs 34-35 of Enclosure 3).
- o Example of a scenario demonstrating the differences between the application of annual and committed dose.
- o Discussion of risk to workers under the concept of committed dose equivalent versus allowing an exemption from the use of committed dose equivalent for long-lived radionuclides as envisioned under 20.205.
- o Interpretation and response to concerns raised by the Nuclear Information and Resource Service as well as by the Nuclear Industry (e.g., NUMARC, GE, CE, and others).
- o Clarification by EPA as to whether the proposal by GE to adopt a system using committed dose for design and daily control of the work place and annual dose to assess and manage the actual dose to workers conforms with the President's Federal guidance.
- o Discussion/explanation of ICRP recommendations regarding 20.205 (Copy of ICRP 84 to be included).

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- o Discussion of the sensitivities and limitations of lung counting and other measuring techniques for determining intakes.
- o Discussion of the change in threshold for monitoring internal doses and measurement difficulties (Ref.: Page 56 of Enclosure 3).
- o Discussion of the impact of lowering airborne concentration limits for radionuclides such as thorium and uranium. Implications for fuel fabrication licensees in terms of risk and cost.
- o Definition of ALARA for other than reactor licensees (Ref.: page 21 of Enclosure 3).
- o Discussion of the basis for changes in 20.1003, disposal by release into sanitary sewage, and comparison with other allowed liquid effluent releases (Ref.: page 73 of Enclosure 3).
- o Likelihood that the BEIR V report will require additional amendments to 10 CFR Part 20. (Staff's expectation and knowledge of the content of the upcoming BEIR V report).
- o List of countries which have adopted the ICRP recommendations on radiation protection.
- o Detailed plans and resource allocation for developing 9 regulatory guides, 3 major changes and 55 minor changes (total of 12,700 staff-hours) prior to the effective date of the revised Part 20.
- o Reason for changing the effective date from that recommended in the proposed rule and that in the final rule. Discussion of industry's concerns.
- o Assurances of correct implementation and interpretation of Part 20 by licensees in light of staff's "permission granting licensees to make handwritten changes to their licenses in order to conform them to the revised 10 CFR Part 20 sections" (Ref.: Page 13 of Enclosure 3).
- o Safety benefits of the proposed Part 20 revisions.
- o Discussion of changes in annual intake limits, correlated with safety benefits.

The staff's presentation will follow a brief but complete written response to the above subjects in layman terms.

OGC will discuss the options and provide a recommendation regarding the backfit issue for Part 20.

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Representing the staff will be:

- (RES)
- (RES)
- (NMSS)
- (NMSS)

Representing UGC will be:

- (OGC)
- (OGC)

- cc: W. Parler
 J. Blaha
 L. Roche
 RES
 NMSS
 ACNW

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