

October 18, 2007 Public Meeting with NEI to Discuss HP Issues for New Reactors
NRC Staff Questions on NEI 07-08 and NEI 07-03

Questions on NEI 07-08, "ALARA" template:

- 1) On Page 2, Section 12.1.3 Operational Considerations, The section titled "ALARA Program Review and Improvement" does not describe a periodic formal audit of the ALARA program as described in RG 8.10, Revision 1-R, reissued May 1977, section C.1.b. page 8.10-2. The template refers to an annual exposure review. Where is the formal audit described?
- 2) On Page 3 of the Template under the section titled "Work Practices," the terms; *high accumulated exposure, exceptionally high radiation levels, and unusually high general radiation levels* , refer to accumulated exposure, removable contamination, and radiation levels but they do not have an equivalent definition in the regulations or guidance which establishes the threshold for additional controls to ensure ALARA.

Are these certain procedurally-specified or defined criteria?

- 3) In the true sense of an operating philosophy of ALARA, shouldn't all work or entries into posted radiation areas be planned prior to the entry? Isn't the only difference the threshold for implementation of additional controls necessary to ensure exposures are maintained ALARA?

Questions on NEI 07-03, "Generic FSAR Template Guidance for Radiation Protection Program Description" template:

- 1) NEI 07-03 does not specifically address reporting requirements (10 CFR 20 Subpart M), other than 10 CFR 20.2201. Please incorporate language indicating compliance with Subpart M, perhaps under Section 12.5.4.7 "Dose Control."
- 2) In Section 12.5.4.12, "Quality Assurance" there is a statement saying that the radiation protection program and procedures will be evaluated against the "quality assurance requirements for the Radiation Protection Program." Consider making this a COL applicant item, so that the applicant may state whether their Radiation Protection Program will be evaluated against NEI 06-14 (QAPD), or alternatively, the Quality Assurance program described in their FSAR (Chapter 17).