

January 7, 2008

Dr. Michael T. Ryan, Chairman
Advisory Committee on Nuclear Waste and Materials
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

SUBJECT: RECOMMENDATIONS ON REGULATORY GUIDE REVISIONS

Dear Dr. Ryan:

Thank you for your letter to Chairman Klein, dated November 30, 2007, regarding the Regulatory Guide (RG) Update Program initiated by the U.S. Nuclear Regulatory Commission (NRC). In your letter, you noted that many RGs issued or updated in the last several years are current and well done. You also provided the observations and recommendations that the Advisory Committee on Nuclear Waste and Materials (ACNW&M or the Committee) developed to assist the NRC staff in accomplishing the program objectives. The staff agrees with the Committee's observations and recommendations that many of the existing RGs are outdated, and are not risk-informed and performance-based.

One of the primary objectives of the RG Update Program is to bring outdated RGs up to current requirements, standards, technologies, methodologies (e.g., updated dosimetric methodologies) and staff technical positions (e.g., Interim Staff Guidance). This includes updating references to current regulations, and acceptable national and international standards, computer codes, and measurement technologies. The staff is revising outdated RGs to include risk-informed and performance-based approaches, where practicable. The staff is also working with Standards Committees to develop standards which can be endorsed by the agency. The staff will provide an opportunity for review and comment for all interested stakeholders, including appropriate NRC advisory committees (e.g., the Advisory Committee on Medical Uses of Isotopes), during the revision of individual RGs.

The staff appreciates the Committee's specific recommendations for consideration in revising the NRC's existing RGs (listed in the enclosure to your letter) and developing new guidance for the agency's licensees and applicants. The recommendations in your enclosure have been forwarded to those NRC organizations with the technical lead for revising the RGs for their use during the development process. For example, the staff is planning to update the Gaseous and Liquid Effluent code in the process of revising RG 1.112, "Calculation of Releases of Radioactive Materials in Gaseous and Liquid Effluents from Light-Water-Cooled Power Reactors," as recommended by the Committee. This RG will be revised along with other RGs listed in the enclosure to your letter over the next 3 years, under the NRC's RG Update Program.

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The staff will continue to provide advanced copies of draft RGs for review and consideration by the ACNW&M, and will provide briefings as requested. We appreciate the Committee's attention to this very important Agency program, and will continue to consider your comments to enhance our RG revision and development activities.

Sincerely,

/RA/

Luis A. Reyes
Executive Director
for Operations

cc: Chairman Klein
Commissioner Jaczko
Commissioner Lyons
SECY

M. Ryan

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