

## HLWYM HEmails

---

**From:** Lane Howard  
**Sent:** Wednesday, September 06, 2006 12:59 PM  
**To:** George Adams  
**Subject:** RE: Re: Question Re 10 CFR Part 63

Good question. Usually even a non-involved worker at a nuclear power plant is still a worker (maybe non-rad) as opposed to a member of the public that 20.1301 is addressing for the 100 mrem limit. Any workers that could exceed 100 mrem would need to be badged and trained. Scenarios like this that get to 24 mrem offsite would probably need to be looked at closely for getting close to 100 mrem onsite.

Lane

-----Original Message-----

From: George Adams [mailto:gadams@cnwra.swri.edu]  
Sent: Wednesday, September 06, 2006 10:37 AM  
To: lhoward@cnwra.swri.edu  
Subject: RE: Re: Question Re 10 CFR Part 63

Lane,

Thanks for this. I was thinking about 20.1301(a)(1). If the offsite dose is 24 mrem, is there a reason to consider a non-involved worker potentially exposed to 100 mrem or more for the scenario?

Thanks,  
George

-----Original Message-----

From: Lane Howard [mailto:lhoward@cnwra.swri.edu]  
Sent: Tuesday, September 05, 2006 3:37 PM  
To: George Adams  
Subject: FW: Re: Question Re 10 CFR Part 63

George,

I thought this might help answer some of the question you asked me on dose limits during the videoconference the other day. The limit for cat 2 from 63.111(b)(2) is 5 rem.

Lane

-----Original Message-----

From: Patrick Mackin [mailto:pmackin@cnwra.swri.edu]  
Sent: Friday, September 01, 2006 9:39 AM  
To: jwinterle@cnwra.swri.edu; smohanty@cnwra.swri.edu; James Durham; lhoward@cnwra.swri.edu; 'Oleg Povetko'  
Cc: bsagar@cnwra.swri.edu  
Subject: FW: Re: Question Re 10 CFR Part 63

All:

Please read the attached message regarding a question that came up during this week's H-415 course. If any of you with expertise in this area of 10 CFR Part 63 disagree with the interpretation that Banad or Rodican Reed have presented here, please respond to them.

Thanks.

Pat

-----Original Message-----

From: Rodican Reed [mailto:RPR1@nrc.gov]

Sent: Friday, September 01, 2006 9:19 AM

To: Patrick Mackin; Brittain Hill; Bhasker Tripathi; Denise Edwards; Doris Lewis; Jin-Ping Gwo; Maria Schwartz; Rosemary Reeves; Ray L. Kellar

Cc: John Ricci; Kien Chang

Subject: Fwd: Re: Question Re 10 CFR Part 63

During the H-415 course this week, there was a brief discussion regarding how doses are calculated for Category 1 events and compared against the performance criteria.

There was some confusion, which I wanted to clarify.

Please see the attached discussion with Banad Jagannath of HLWRS.

For the consequence assessment, frequency-weighted doses from Category 1 event sequences are aggregated and added to the dose from normal operations and this result is compared against the performance criteria.

Since the doses are "annualized", the dose from each Category 1 event is weighted by frequency of occurrence. This weighted product of dose and frequency for each Category 1 event is summed over all Category 1 event sequences and added to the dose from normal operations.

However, for Category 2 event sequences, the dose is calculated and compared against the performance criteria for each separate Category 2 event sequence, without aggregation or weighting by frequency.

For further information, I recommend you read 10 CFR Part 63.111 and the YMRP, Section 2.1.1.5 Consequence Analyses, paying particular attention to Review Method 3 on page 2.1-31, where it states that:

"Verify that an appropriate method has been used to aggregate the doses from normal operations and annualized doses from Category 1 event sequences."

This interpretation is consistent with how we have been teaching this subject in the H-403 HLW HP Course. Whether this approach will remain in the same in the future, I am not sure.

If you have questions, please see Banad or me.

Thanks and I hope you enjoyed the H-415 course!

Rod Reed

>>> Banad Jagannath 08/30/2006 8:09 AM >>>

Your understanding of dose compliance for Category 1 event sequences is correct. However, dose compliance for Category 2 event sequences is for each occurrence and is not frequency weighted.

Banad Jagannath

>>> Rodican Reed 08/30/2006 7:41 AM >>>

I want to test my understanding of how we treat consequence assessment for Category 1 and Category 2 events.

It has been my understanding that for Category 1 event sequences, we weight the dose by frequency of the event and aggregate the events by summing the weighted doses. This is then added to dose from normal operations to be compared against the performance criteria.

The current Part 63 says we will aggregate Category 1 events and the YMRP says the doses will be annualized, which I presume means weighted by frequency

We do not aggregate Category 2 events is also my understanding.  
However, are Category 2 events weighted by frequency in the consequence assessment.

Please confirm my understanding or correct it, if necessary. What do we plan to do in the future in the new revise Part 63.

This is needed for training purposes.

Thanks!

**Hearing Identifier:** HLW\_YuccaMountain\_Hold\_EX  
**Email Number:** 903

**Mail Envelope Properties** (lhoward@cnwra.swri.edu20060906125900)

**Subject:** RE: Re: Question Re 10 CFR Part 63  
**Sent Date:** 9/6/2006 12:59:28 PM  
**Received Date:** 9/6/2006 12:59:00 PM  
**From:** Lane Howard

**Created By:** lhoward@cnwra.swri.edu

**Recipients:**  
"George Adams" <gadams@cnwra.swri.edu>  
Tracking Status: None

**Post Office:**

<b>Files</b>	<b>Size</b>	<b>Date &amp; Time</b>
MESSAGE	4978	9/6/2006 12:59:00 PM

**Options**  
**Priority:** Standard  
**Return Notification:** No  
**Reply Requested:** No  
**Sensitivity:** Normal  
**Expiration Date:**  
**Recipients Received:**