



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
ADVISORY COMMITTEE ON NUCLEAR WASTE  
WASHINGTON, D.C. 20555

September 30, 1992

Mr. James M. Taylor  
Executive Director for Operations  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Dear Mr. Taylor:

SUBJECT: DRAFT REGULATORY GUIDE 8013, "ALARA RADIATION PROTECTION PROGRAM FOR EFFLUENTS FROM MATERIALS FACILITIES"

During its 46th meeting, September 22 and 25, 1992, the Advisory Committee on Nuclear Waste met with the NRC staff to review draft Regulatory Guide 8013, "ALARA Radiation Protection Program for Effluents From Materials Facilities." On the basis of this review, we offer the following comments:

1. One of the primary objectives of the regulatory guide is to offer recommendations for limiting radionuclide releases and accompanying radiation exposures to members of the public. Since the goal is to limit the effective dose to the individual likely to be most highly exposed, we believe it would be useful to elaborate on the process used to identify this person. The approach recommended by the International Commission on Radiological Protection is to identify a critical group within the exposed population who, because of its location and living habits, would receive the highest dose. Since it is often difficult to identify the single individual receiving the highest dose, it is generally assumed that protection of the critical group as a whole will provide adequate protection to the most highly exposed individual within that group. We recommend that licensees be permitted a similar approach.
2. To assist in demonstrating compliance with the requirements of 10 CFR Part 20, the guide recommends that licensees set ALARA goals for radionuclide concentrations in effluents at 10 to 20 percent of the regulatory limits. Although we understand that these percentages were selected to ensure that NRC licensees meet the Environmental Protection Agency's (EPA's) National Emission Standards for Hazardous Air Pollutants (NESHAPs), we believe the recommendation is too specific and that the new lower limits could, in time, become de facto regulations. To avoid this, we suggest that the regulatory guide recommend that ALARA goals be set at a "small fraction" of the regulatory limits. This will, in our opinion, accomplish the

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same purpose while avoiding any regulatory misinterpretation. Surveys can be conducted periodically, as is the case now, to ensure that materials facilities licensed by the NRC meet the EPA's NESHAPs.

We trust that these comments will be helpful. We recommend that the regulatory guide be issued as soon as practicable.

Sincerely,



Dade W. Moeller  
Chairman

Reference:

U.S. Nuclear Regulatory Commission, Office of Nuclear Regulatory Research, Draft Regulatory Guide 8013, "ALARA Radiation Protection Program for Effluents From Materials Facilities," August 18, 1992, transmitted by memorandum dated August 20, 1992 from C. J. Heltemes, RES, to R. F. Fraley, ACRS