April 14, 2010

MEMORANDUM TO: Stephanie Bush-Goddard, Chief
Health Effects Branch
Division of Systems Analysis
Office of Nuclear Regulatory Research

FROM: Doris Lewis, Health Physicist ***/RA/***
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SUBJECT: PUBLIC MEETING BETWEEN THE U.S. NUCLEAR REGULATORY COMMISSION AND THE NUCLEAR ENERGY INSTITUTE FOR THE DISCUSSION ON REGULATORY GUIDE 8.7, REVISION 2, "INSTRUCTIONS FOR RECORDING AND REPORTING OCCUPATIONAL RADIATION DOSE DATA"

On March 5, 2010, the U.S. Nuclear Regulatory Commission (NRC) staff met with the Nuclear Energy Institute (NEI) at NRC's interim Church Street building to discuss Regulatory Guide (RG) 8.7, Revision 2, "Instructions for Recording and Reporting Occupational Radiation Dose Data." A public meeting notice was issued on February 18, 2010, and was posted on NRC's external (public) Web page (ADAMS Accession No. ML100490746).

The purpose of this public meeting was for NRC staff to provide information on the revision of RG 8.7, Revision 2 and seek input from NEI on current industry uses of this document. NRC staff informed NEI that RG 8.7, Revision 2 would be revised for consistency with changes to Title 10 of the *Code of Federal Regulations* Part 20 (10 CFR Part 20) specifically as it relates to the change in definition of the total effective dose equivalent (TEDE). In December 2007, NRC published a *Federal Register* notice on changes to 10 CFR Parts 19, 20, and 50 that became effective on February 15, 2008. The previous definition of TEDE was the sum of the deep dose equivalent for external exposures and the committed effective dose equivalent (CEDE) for internal exposures. The new definition of TEDE is the sum of the effective dose equivalent for external exposures and the CEDE.

Under 10 CFR Part 20.2206, licensees are required to report their yearly occupational radiation exposure information to NRC by April 30. RG 8.7, Revision 2 provides NRC and Agreement State licensees with instructions for recording and reporting occupational radiation dose data on two forms—NRC Form 4, "Cumulative Occupational Dose History," and NRC Form 5, "Occupational Dose Record for a Monitoring Period"—that are submitted by April 30 to NRC and licensee employees, respectively. Because RG 8.7, Revision 2 and NRC Forms 4 and 5 contain information on the previous definition of TEDE, the NRC staff is exploring options to revise these documents for consistency with the current 10 CFR Part 20 TEDE definition.

After the NRC staff provided background information on RG 8.7, Revision 2 and the new definition of TEDE, NEI provided input on the current use of RG 8.7, Revision 2 by industry.

NEI commented that RG 8.7, Revision 2 provides useful information for the electronic reportingof occupational radiation dose data. The current document also provides the nuclear reactor industry with the guidance it needs for maintaining compliance with 10 CFR 20.2206.

NEI also provided a comment matrix document for RG 8.7, Revision 2 that included suggested changes. NRC and NEI discussed each of the comments in detail, and NRC staff found the comment matrix document helpful because it identified some areas of the current regulatory guide that could be enhanced to provide clarity. In addition, NEI commented that a major change to NRC Forms 4 and 5 would require industry to expend a significant amount of funds to change existing information systems that contain occupational radiation dose data. NRC staff noted that any change to NRC Forms 4 and 5 would require the agency to look at the backfit rule for potential impacts.

In closing this meeting, NRC staff stated that a presentation and special topic seminar on updates to RG 8.7, Revision 2 and potential changes to NRC Forms 4 and 5 will be held during the International Dosimetry and Records Symposium in June 2010.

No members of the public participated in this meeting.

Enclosures:
Public Meeting Attendee List
NEI Comment Matrix Document

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NEI Comment Matrix Document

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