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General Comment

In response to the Request for Comments by the Nuclear Regulatory Commission on the proposed revision to Regulatory Guide 4.20 (Dec 1996), the Division of Radiation Safety, ORS, National Institutes of Health (NIH) wishes to submit the following comments:

In this proposal, the NRC intends to change how licensees comply with 10 CFR 20.1101(d), which places a 10 mrem/yr dose constraint on members of the public as a result of air emissions from the licensee. The current Regulatory Guide deems licensees to be compliant if they can show they are less than 20% of the 10 CFR 20 Appendix B air effluent limits. The proposed revision reduces this to 10% of the effluent limits to show compliance with the 10 mrem/yr constraint.

Additionally, the proposed revision increases the number of specific methodologies that are acceptable to the NRC for demonstrating compliance.

The practical effect of this change will be to cut the effluent limit in half while giving licensees more ways to show they are compliant. Because the NIH believes it can comply with the reduced effluent limits without undue hardship, we do not oppose the proposed revision to Regulatory Guide 4.20.

However, there are likely to be licensees whose engineering controls and monitoring capabilities are aligned with the current 20% threshold. For this reason, we believe it would be appropriate to give existing licensees some time (up to 5 years) after the potential effective approval date to make programmatic changes or capital improvements as necessary to meet the new 10% threshold.

SUNSI Review Complete
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 Call = M. Bayssie (HMB1)