

REGULATORY ANALYSIS

Administrative Practices in Radiation Surveys and Monitoring Proposed Revision 1 of Regulatory Guide 8.2, dated February 1973

1. Statement of the Problem

The Nuclear Regulatory Commission (NRC) first issued Regulatory Guide 8.2 in February 1973 to provide guidance for administrative practices in radiation monitoring endorsing the American National Standards Institute (ANSI) N13.2-1969. This standard has been withdrawn and is no longer endorsed in this guide. Also, Title 10 of the *Code of Federal Regulations* (CFR) Part 20 has been revised and includes revised citations regarding surveys and monitoring. Such citations have been updated in this revision to conform to the revised regulations. In addition, the NRC staff has developed various volumes of NUREG-1556 and NUREG-1736 that include pertinent guidance on surveys and monitoring.

2. Objective

The objective of this regulatory action is to provide current guidance on administrative practices associated with surveys and monitoring acceptable to the NRC for use in complying with NRC regulations.

3. Alternative Approaches

The NRC staff considered the following alternative approaches:

- Do not revise Regulatory Guide 8.2.
- Revise Regulatory Guide 8.2.

3.1 Alternative 1: Do Not Revise Regulatory Guide 8.2

Under this alternative, the NRC would not revise the guidance, and the current guidance would be retained. This alternative is considered the baseline or “no-action” alternative and, as such, involves no value/impact considerations. However, this alternative would not address the outdated ANSI N13.2-1969, the revised citations in the current 10 CFR Part 20, and the applicable volumes of NUREG-1556 and NUREG-1736.

3.2 Alternative 4: Revise Regulatory Guide 8.2

Under this alternative, the NRC would revise Regulatory Guide 8.2 to reflect current regulations, guidance, and practices.

One benefit of this action is that it would reflect current NRC requirements and would enhance the surveys and monitoring program. The cost to the NRC would be the one-time cost of issuing the revised regulatory guide (which is expected to be relatively small), and since compliance is not mandatory, licensees would incur little or no cost.

4. Conclusion

Based on this regulatory analysis, the staff recommends revision of Regulatory Guide 8.2. The staff concludes that the proposed action will enhance surveys and monitoring practices and reflect current NRC regulations and other available guidance. Therefore, the revision of this regulatory guidance is necessary.