REGULATORY ANALYSIS

DRAFT REGULATORY GUIDE DG-8050
APPLICATIONS OF BIOASSAY FOR RADIOIODINE

(Proposed Revision 2 of Regulatory Guide 8.20, dated September 1979)

Statement of the Problem

Regulatory Guide 8.20, Revision 1, is 30 years old and no longer references the proper regulations and techniques. Therefore, revision of this regulatory guidance to update it to current regulations and standards is desirable

Objective

The objective of this regulatory action is to revise Regulatory Guide 8.20, Revision 1.

Alternative Approaches

The U.S. Nuclear Regulatory Commission (NRC) staff considered the following alternative approaches:

Do not revise Regulatory Guide 8.20.
Revise Regulatory Guide 8.20.

Alternative 1: Do Not Revise Regulatory Guide 8.20

Under this alternative, the NRC would not revise or issue additional guidance, and the current guidance would be retained. If NRC does not take action, there would not be any changes in costs or benefit to the public, licensees or NRC. However, the "no-action" alternative would not address identified concerns with the current version of the regulatory guide. The NRC would continue to review each application on a case-by-case basis. This alternative provides a baseline condition from which any other alternatives will be assessed.

Alternative 2: Revise Regulatory Guide 8.20

Under this alternative, the NRC would revise Regulatory Guide 8.20, taking into consideration the regulations which were revised in the 1990's and 2000's.

One benefit of this action is that it would enhance understanding of preferred methodology by licensed users.

The impact to the NRC would be the costs associated with revising and issuing the regulatory guide. The impact to the public would be the voluntary costs associated with reviewing and providing comments to NRC during the public comment period. The value to NRC staff and its applicants would be the benefits associated with enhanced efficiency and effectiveness in using a common guidance document as the technical basis for license applications and other interactions between the NRC and its regulated entities.

Conclusion

Based on this regulatory analysis, the NRC staff recommends revision of Regulatory Guide 8.20. The staff concludes that the proposed action will enhance understanding of techniques associated with use of radioiodine, and possibly reduce costs by provision of a standard which all licensees could reference.