REGULATORY ANALYSIS

ADMINISTRATIVE PRACTICES IN RADIATION SURVEYS AND MONITORING

Proposed Revision 1 of Regulatory Guide 8.2

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. The standard was reaffirmed in 1982, but there has not been a revision since its inception. The standard refers to obsolete technical practices as well as outdated requirements and is no longer endorsed in this guide. Also, since the February 1973 issuance of Regulatory Guide 8.2, the applicable NRC regulations, Title 10 of the *Code of Federal Regulations* (CFR), Part 20, has been revised. In addition, the NRC staff has developed various volumes of NUREG-1556, "Consolidated Guidance about Materials Licenses," Volumes 1–18 and Volumes 20–21, with various issue dates. Also, guidance pertinent to all licensees, regarding radiation surveys and monitoring, appears in NUREG-1736, "Consolidated Guidance: 10 CFR Part 20—Standards for Protection against Radiation," issued October 2001.

Objective

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

Alternative Approaches

The NRC staff considered the following alternative approaches:

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

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 However, this alternative would not address the outdated ANSI N13.2-1969, the revisions to 10 CFR Part 20, and the applicable volumes of NUREG-1556 and NUREG-1736.

Alternative 2: 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 as such, 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.

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 currently available NRC guidance.