REGULATORY ANALYSIS

Draft Regulatory Guide DG-7007 (Proposed Revision 1 of Regulatory Guide 7.7), "Administrative Guide for Verifying Compliance with Packaging Requirements for Shipment and Receipt of Radioactive Material"

Statement of the Problem

The NRC published Regulatory Guide 7.7 in August 1977 to provide licensees with agency-approved guidance for complying with the administrative requirements in both 10 CFR Part 71 and 49 CFR Part 173. The regulatory guide endorsed American National Standards Institute (ANSI) N14.10.3-1975, "Administrative Guide for Verifying Compliance with Packaging Requirements for Shipments of Radioactive Materials." In the 30 years since the NRC published the regulatory guide, the regulations have changed several times, and ANSI Subcommittee N14.10 withdrew ANSI guide N14.10.3-1975. Instead of withdrawing this regulatory guide, the staff proposes to update it and broaden the scope to include most routine actions performed to meet NRC regulations when packaging, shipping, and receiving radioactive material.

Objective

The objective of this regulatory action is to provide licensees with an acceptable method to satisfy the administrative requirements in 10 CFR Parts 20 and 71 for the packaging, shipment, and receipt of radioactive material.

Alternative Approaches

The NRC staff considered the following alternative approaches:

- Do not revise Regulatory Guide 7.7.
- Withdraw Regulatory Guide 7.7.
- Revise and Expand Regulatory Guide 7.7.

<u>Alternative 1: Do Not Revise Regulatory Guide 7.7</u>

Under this alternative, the NRC would not revise this document, and the current guidance would be retained. However, this alternative would leave conflicting guidance in place and could cause unnecessary confusion. Additionally, the regulatory guide would be endorsing an ANSI standard that has been withdrawn and does not include information in later changes to both NRC and DOT regulations. This alternative is considered the baseline or "no-action" alternative and, as such, involves no value/impact considerations.

<u>Alternative 2: Withdraw Regulatory Guide 7.7</u>

The staff considered withdrawing this regulatory guide; however, because of the lack of general information provided to licensees on administrative requirements in 10 CFR Part 71, the staff believes that it should update the regulatory guide. In updating the guide, the staff removed information solely used to meet DOT requirements and included methods for meeting NRC-required administrative items not previously included in the regulatory guide. This alternative

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costs relatively little. The guidance provides a quick means for interested entities to identify the requirements necessary to meet the NRC's administrative requirements when packaging, shipping, and receiving radioactive material.

Alternative 3: Revise Regulatory Guide 7.7

The staff believes that providing guidance in this area would be beneficial to applicants, vendors, and licensees. Consolidating regulatory guidance into a single document will simplify the process for shippers and receivers of radioactive materials, particularly for newer licensees or vendors and those who make infrequent shipments of radioactive material.

Conclusion

Based on this regulatory analysis, the NRC staff recommends the revision of Regulatory Guide 7.7 to provide licensees with a method to meet the administrative requirements in 10 CFR Part 71 for the shipment of radioactive material. The staff concludes that the proposed action will result in an improved, uniform regulatory process. Moreover, the staff sees no adverse effects associated with issuing this regulatory guide.

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