

November 13, 2012

J. Sam Armijo, Chairman
Advisory Committee on Reactor Safeguards
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

SUBJECT: RESPONSE TO THE ADVISORY COMMITTEE ON REACTOR SAFEGUARDS
LETTER DATED OCTOBER 16, 2012, ON "SECY-12-0064,
RECOMMENDATIONS FOR POLICY AND TECHNICAL DIRECTION TO
REVISE RADIATION PROTECTION REGULATIONS AND GUIDANCE"

Dear Dr. Armijo:

I am responding to your letter of October 16, 2012, which provided the Advisory Committee on Reactor Safeguards' (ACRS) views on the NRC's staff's recommendations for policy and technical direction to revise radiation protection regulations and guidance (SECY-12-0064). We appreciate the support of the ACRS for the staff's recommendations to update the scientific bases for calculating exposure; continue discussions on alternative approaches to individual protection at, or near, the dose limit; continue discussions of the appropriate regulatory approach for dose to the lens of the eye and the embryo/fetus; and improve reporting of occupational exposure.

The staff agrees that implementation of the As Low As Reasonably Achievable (ALARA) principle is a key component of an effective regulatory program for radiation protection, and that licensee implementation of the principle has generally resulted in occupational doses that are substantially lower than the occupational dose limit. The staff believes that examining mechanisms to increase the effectiveness of ALARA programs is one logical continuation of interactions with stakeholders. The key issue is how to deal with individual protection for the small percentage of individuals who may approach the limit over the course of many years, without inappropriately impacting the conduct of licensed activities.

J. Armijo

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The Commission has not yet provided direction to the staff in response to SECY-12-0064. Once direction has been received, we look forward to continuing to work with the ACRS on these issues.

Sincerely,

/RA by Michael F. Weber for/

R. W. Borchardt
Executive Director
for Operations

cc: Chairman Macfarlane
Commissioner Svinicki
Commissioner Apostalakis
Commissioner Magwood
Commissioner Ostendorff
SECY

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