

COMMUNICATION PLAN FOR POTENTIAL CHANGES TO 10 CFR PART 20 REGULATIONS AND GUIDANCE

PURPOSE

The objective of this communication plan is to outline the U.S. Nuclear Regulatory Commission (NRC) strategy for communicating the goals and key messages regarding the potential changes to the agency's radiation protection standards and guidance. The potential changes could achieve greater alignment between the NRC's radiation protection regulations and the 2007 recommendations of the International Commission on Radiological Protection (ICRP) contained in ICRP Publication 103 (2007), "The 2007 Recommendations of the International Commission on Radiological Protection."

This plan will help the NRC continue effective communications with internal and external stakeholders regarding the following tasks:

- **Promote** effective communications with internal and external stakeholders in a timely, consistent, and effective manner.
- **Inform** all stakeholders that in examining any potential changes to the NRC radiation protection regulations that the NRC staff will use processes that promote openness and technical rigor in our communications and decision makings.
- **Identify** opportunities for interacting with stakeholders to ensure that the cumulative effectiveness of regulation impacts from any potential changes to NRC's radiation protection standards are fully considered.

KEY MESSAGES


The key messages for communication to stakeholders are as follows:

- The current NRC regulatory framework provides adequate protection of the health and safety of workers, the public, and the environment.
- The NRC is considering revising its radiation protection standards to provide greater alignment with the ICRP Publication 103 (2007) recommendations in accordance with the regulatory process outlined by the Commission in SRM-SECY-12-0064, "Recommendations for Policy and Technical Direction to Revise Radiation Protection Regulations and Guidance," dated December 12, 2012. The NRC's radiation protection standards in 10 CFR Part 20 have not been revised since 1991.
- The potential revisions would address:
 1. Alignment with ICRP Publication 103 methodology and terminology;
 2. Occupational dose limit for the lens of the eye;
 3. Dose Limit for the embryo/fetus of a declared pregnant occupational worker;
 4. Individual protection—as low as reasonable achievable (ALARA) planning;
 5. Metrication—units of radiation exposure and dose; and

6. Reporting of occupational exposures to the Radiation Exposure Information and Reporting System (REIRS).
 - The NRC published an Advance Notice of Proposed Rulemaking (ANPR) in the *Federal Register* on July 25, 2014 (79 FR 43284), and will hold a series of public meetings to describe its process relative to this effort and to obtain feedback from the public, industry, Federal and State agencies on this effort.

BACKGROUND

The NRC's primary radiation protection regulations are in Part 20 of Title 10 of the *Code of Federal Regulations* (10 CFR). The 10 CFR Part 20 regulations establish protection standards for both members of the public and occupational workers from ionizing radiation resulting from activities licensed by the NRC. All NRC licensees are required to follow these regulations. In addition, in accordance with the Section 274b Agreements of the Atomic Energy Act, as amended, the 37 Agreement States have adopted requirements essentially identical to NRC's radiation protection standards for the regulation of activities involving radioactive material in their States.

On December 18, 2008, the staff of the U.S. Nuclear Regulatory Commission (NRC) submitted a Policy Issue Notation Vote Commission Paper, [SECY-08-0197](#), requesting approval to revise the agency's radiation protection regulations and guidance to achieve greater alignment with the [2007 Recommendations of the International Commission on Radiological Protection](#)  (ICRP Publication 103 (2007)). [The NRC's [Synopsis of ICRP Publication 103](#), which is available through the Agencywide Documents Access and Management System (ADAMS), discusses the broad implications of the new recommendations.] Specifically, the revisions proposed to achieve alignment would affect the regulatory framework provided by Title 10, Part 20, of the *Code of Federal Regulations* ([10 CFR Part 20](#)), "Standards for Protection Against Radiation"; [10 CFR Part 50](#), "Domestic Licensing of Production and Utilization Facilities"; and [Appendix I to 10 CFR Part 50](#), "Numerical Guides for Design Objectives and Limiting Conditions for Operation to Meet the Criterion 'As Low as is Reasonably Achievable' for Radioactive Material in Light-Water-Cooled Nuclear Power Reactor Effluents."

The Commission subsequently accepted the staff's recommendation through the related Staff Requirements Memorandum ([SRM-SECY-08-0197](#)), dated April 2, 2009, instructing the staff to immediately begin engagement with stakeholders and interested parties to initiate development of the technical basis (now referred to as regulatory basis) for possible revision of the NRC's radiation protection regulations, as appropriate and where scientifically justified, to achieve greater alignment with the ICRP Publication 103 (2007) recommendations. In addition, the staff will seek to identify the scope of any warranted conforming changes in other parts of the 10 CFR regulations. The Commission also directed the staff to continue its participation in various national and international forums, recognizing that these efforts and the evaluation of alignment with ICRP Publication 103: 1) will inform NRC where changes to regulations may be merited; 2) will help establish a regulatory basis for instances where exceptions to ICRP Publication 103 (2007) continue to be appropriate; and 3) will result in continued high assurance that NRC's regulatory framework for radiation protection is sound. In response to SRM-SECY-08-0197, the staff has undertaken several efforts to examine the possible impacts of changing 10 CFR Part 20. With respect to 10 CFR Part 20, a summary of the technical issues and stakeholder feedback is provided in Enclosure 3 of SECY-08-0197.

Notably, in its April 2009 decision, the Commission agreed with both the NRC staff and the NRC's Advisory Committee on Reactor Safeguards (ACRS) that "the current NRC regulatory framework continues to provide adequate protection of the health and safety of workers, the public, and the environment." In this regard, the Commission stated that from "a safety regulation perspective, ICRP Publication 103 (2007) proposes measures that go beyond what is needed to provide for adequate protection." During the outreach activities associated with the potential alignment with the ICRP Publication 103 (2007) recommendations, the Commission directed the NRC staff to "focus the discussion on discerning the benefits and burdens associated with revising the radiation protection regulatory framework." The Commission also directed the NRC staff to examine how a lower occupational dose limit of 20 mSv (2 rem) per year has affected the medical and industrial sectors in countries that have implemented the ICRP recommendation when developing the technical basis for the rulemaking. Finally, based on the extent and complexity of the stakeholder comments received, the Commission directed the NRC staff to either (1) provide the Commission with a proposed rule once the technical basis (regulatory basis) has been developed, or (2) provide a paper to the Commission outlining any substantive policy issues and options for their resolution prior to developing a proposed rule.

In response to the Commission's direction in SRM-SECY-08-0197, NRC staff conducted stakeholder outreach activities on issues about potential changes to the NRC's radiation protection regulations. Three Federal Register notices were issued requesting public feedback and comments (74 FR 32198, July 7, 2009; 75 FR 59160, September 27, 2010; and 76 FR 53847, August 30, 2011). Presentations and discussions were made at a variety of professional societies, licensee organizations, public interest groups, and State organizations (e.g., Conference of Radiation Control Program Directors and the Organization of Agreement States). In addition, the NRC staff conducted a series of facilitated round table workshops in Washington, DC, Los Angeles, CA, and Houston, TX. Transcripts of each workshop and written comments received in response to the *Federal Register* notices are publicly available through the NRC's public Web site on the page entitled, "Options to Revise Radiation Protection Regulations and Guidance," <http://www.nrc.gov/about-nrc/regulatory/rulemaking/potential-rulemaking/opt-revise.html>.

After extensive stakeholder engagement, the NRC staff determined that an additional paper to the Commission outlining substantive policy issues was needed. This additional policy paper was provided as SECY-12-0064, "Recommendations for Policy and Technical Direction to Revise Radiation Protection Regulations and Guidance," dated April 25, 2012 (ADAMS Accession No. ML121020108). The SECY-12-0064 paper summarized the NRC staff's interactions with stakeholders as directed by SRM-SECY-08-0197, and provided policy and technical guidance on potential revisions to the NRC's radiation protection regulations.

In SRM-SECY-12-0064, "Recommendations for Policy and Technical Direction to Revise Radiation Protection Regulations and Guidance," dated December 17, 2012 (ADAMS Accession No. ML12352A133), the Commission approved in part and disapproved in part the NRC staff's recommendations. Specifically, the Commission approved the NRC staff's development of a draft regulatory basis for a revision to 10 CFR part 20 to align with the most recent methodology and terminology for dose assessment in ICRP Publication 103 (2007), including consideration of any conforming changes to all NRC regulations. The Commission directed the NRC staff to develop improvements in the NRC's guidance for those segments of the regulated community that would benefit from more effective implementation of the ALARA strategies and programs to comply with regulatory requirements. The Commission also directed the NRC staff to continue discussions with stakeholders regarding dose limits for the lens of the eye and the embryo/fetus.

Based on direction from the Commission, the NRC staff also continues discussions with stakeholders on alternative approaches to deal with individual protection at or near the current dose limit. In addition, the Commission directed the NRC staff to improve reporting of occupational exposure by the NRC and Agreement State licensees to the NRC's REIRS database. Finally, the Commission disapproved the NRC staff's recommendations to develop a draft regulatory basis to reduce the occupational total effective dose equivalent to 20 mSv (2 rem) per year. The Commission also disapproved the elimination of traditional or "English" dose units to measure radiation exposure from the NRC's regulations. Rather, the Commission directed the continuation of the use of both traditional and International System (SI) units in the NRC's regulations.

The NRC staff hereby establishes a communication plan to guide NRC staff communications with internal and external stakeholders related to Commission direction provided in SRM-SECY-12-0064 concerning the potential changes to 10 CFR Part 20. This communication plan should be used to respond to stakeholder inquiries.

In a separate and related activity, the NRC staff is considering revising the 10 CFR Part 50, Appendix I (RIN 3150-AJ38; NRC-2014-0044), which concerns the NRC's design objectives governing dose assessments for radioactive effluents from light-water-cooled nuclear power reactors. The potential revisions of the 10 CFR part 50, Appendix I are also in response to the Commission's direction in SRM-SECY-12-0064, which stated that the NRC staff shall, along with the development of the draft regulatory basis for the 10 CFR part 20 regulations, engage in a parallel effort to develop a draft regulatory basis for aligning the 10 CFR part 50, appendix I, design objectives with the most recent methodology and terminology for dose assessment. A separate communication plan has been developed to address this effort.

AUDIENCE

Internal Stakeholders

Commission
Office of Executive Director for Operations (OEDO)
Office of Federal and State Materials and Environmental Management Programs (FSME)
Office of Nuclear Material Safety and Safeguards (NMSS)
Office of Nuclear Reactor Regulation (NRR)
Office of New Reactors (NRO)
Office of Nuclear Regulatory Research (RES)
Office of Nuclear Security and Incident Response (NSIR)
Office of the General Counsel (OGC)
Office of Congressional Affairs (OCA)
Office of Public Affairs (OPA)
Advisory Committee on Reactor Safeguards (ACRS)
Region I
Region II
Region III
Region IV

External stakeholders

Organization of Agreement States, Inc. (OAS)
Agreement States (Individual States)
Agreement State licensees
Conference of Radiation Control Program Directors, Inc. (CRCPD)
Nuclear Energy Institute (NEI)
Electrical Power Research Institute (EPRI)
NRC Licensees
Congressional members
General Public
Media
State Officials
Local Officials

COMMUNICATION TEAM

Contacts in Headquarter Offices		
Cardelia Maupin	301-415-2312	Sr. Project Manager, RPMB/ FSME/DILR
Andrew Carrera	301-415-1078	Health Physicist, RPMB/ FSME/DILR
Donald Cool	301-415-6347	Sr. Advisor, FSME/DILR
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Andrew Pessin	301-415-1062	Senior Attorney, OGC
Maureen Conley	301-415-8202	Public Affairs Officer, OPA
Jenny Weil	301-415-1691	Congressional Affairs Officer, OCA
Contacts in Regional Offices		
TBD		
Inter Office and Other Facility Stakeholder Contacts		
TBD		

COMMUNICATION TOOLS

This Communication Plan and associated information will be provided to NRC management and staff for communication with external stakeholders. The Communication Team will prepare and maintain a set of Questions and Answers for use in communicating with stakeholders.

Congressional Communications

The Office of Congressional Affairs will coordinate all communication with Congress, including letters to Congress regarding the publication of the ANPR and any other significant activities associated with the potential rulemaking.

Media and Public Communications

The Office of Public Affairs will respond to questions from the media and the public. A press release will be issued for all major activities associated with any potential changes to NRC's radiation protection standards.

Employee Communication

The Communication Team will provide a brief news item on the issue to both the FSME web site and the NRC Blog. An extensive collection of information that discusses NRC's [Options to Revise Radiation Protection Regulations and Guidance](#) is available on NRC's public web page.

Public Stakeholder Communications

The NRC will hold a series of Category 3 public meetings specific to the six issues identified in the ANPR. The public meetings will be held during the ANPR public comment period. Please see Attachment 1, "Communication Timeline" for the list of proposed public meetings.

The public meetings will provide forums for the NRC staff to discuss the issues and questions identified in the ANPR with external stakeholders and to receive information to support development of a draft regulatory basis for a potential revision of the radiation protection requirements in 10 CFR Part 20.

EVALUATION AND MONITORING

The Communication Team will ensure that all public communications are consistent with the key messages. The Communication Team will assess the success of the communication plan through informal and formal feedback from stakeholders.

Attachments:

1. Communication Timeline
2. Questions & Answers

COMMUNICATION TIMELINE

Date	Action	Responsible Individual/ Organization
February 6, 2013	Federal Agency Coordination -Meeting with FDA to discuss occupational doses (Donald L. Miller, MD)	Part 20 WG
February 21, 2013	Briefing of Radiation Protection Steering Committee	Cardelia Maupin/ Dr. Donald Cool
March 27, 2013	Coordination with other Federal agencies on issues relating to Part 20--the Federal Guidance Report Subcommittee (NRC, DNFSB, DOD, DOE, DOT, EPA, and FDA)	Dr. Donald Cool
April 10, 2013	OEDO Alignment Meeting	Cardelia Maupin/ Dr. Donald Cool
April 11, 2013	Coordination with industry -NEI Health Physics (HP) working group discussion on occupational dose limits near the limits	Dr. Donald Cool
May 1, 2013	ISCORS Presentation	Dr. Donald Cool
May 22, 2013	CRCPD Presentation	Dr. Donald Cool
June 3, 2013	Internal Dosimetry and Records Symposium	Dr. Donald Cool
June 4, 2013	New England HP Society Meeting	James Noggle, Chief Plant Support Branch 2 USNRC Region I
June 7, 2013	Coordination with other Federal Agencies: Briefing of on EPA Draft ANPR: Revision of Environmental Radiation Protection Standards for Nuclear Power Operations	Cardelia Maupin
June 10, 2013	ACUMI Meeting Presentation	Cindy Flannery
July 8, 2013	Health Physics Society 58th Annual Meeting	Dr. Donald Cool
July 29, 2013	Nuclear Energy Institute (NEI) Radiation Protection Forum	Dr. Donald Cool
August 4-8, 2013	The American Association of Physicist in Medicine	Cindy Flannery
August 19, 2013	Organization of Agreement State Meeting	Christopher Miller
September 26, 2013	The 18th Annual Scientific Session of the American Society of Nuclear Cardiology	Dr. Donald Cool
October 24-25, 2013	North Carolina Health Physics Society Fall Meeting	Cindy Flannery
February 11, 2014	Presentation at HPS Mid-Year Meeting	Dr. Donald Cool
March 13, 2014	Presentation at Regulatory Information Conference (RIC)	Dr. Donald Cool
May 21, 2014	CRCPD, Special Interest Session	Dr. Donald Cool
July 13, 2014	Deliver presentation at Health Physics Society Meeting (Baltimore, MD)	Dr. Donald Cool /Cindy Flannery
July 25, 2014	Advanced Notice for Proposed Rulemaking (ANPR) for 10 CFR Part 20 published in Federal Register	Cardelia Maupin
July 25, 2014	Send out notifications to stakeholder list by email	Solomon Sahle

Date	Action	Responsible Individual/ Organization
July 25, 2014	Press Release	Cardelia Maupin/ Maureen Connelly
July 30, 2014	FSME Letter to All States and State Liaison Officers informing them of opportunity to comment on ANPR	Cardelia Maupin
August 4, 2014	Deliver presentation at NEI Health Physics Forum (San Diego, CA)	Dr. Donald Cool /Cindy Flannery
August 7, 2014	Letters to NRC's Congressional Oversight Committees	OCA
September 24, 2014	Kick Off Public Meeting	Cardelia Maupin
September 25, 2014	Briefing of NRC Radiation Protection Steering Committee	Part 20 WG
October 2, 2014	Second Public Meeting	Cardelia Maupin
October 6, 2014	Penn State Radiation Safety Roundtable	Cindy Flannery
October 9, 2014	Third Public Meeting	Cardelia Maupin
October 16, 2014	Fourth Public Meeting	Cardelia Maupin
October 23, 2014	Fifth Public Meeting	Cardelia Maupin
October 30, 2014	Sixth Public Meeting	Cardelia Maupin
November 24, 2014	Comment Period Ends	
December 18, 2014	Complete Commission Paper, "Status of Effort and Potential Policy Issues"	Cindy Flannery
TBD	Oak Ridge publishes limited number of external dose coefficients	
TBD	Oak Ridge publishes "proof-of-concept" dose coefficients that includes a limited number of internal and external dose coefficients	
TBD	Oak Ridge publishes all internal and external dose coefficients	
TBD	Revise Regulatory Guides, NUREGS, Generic Communications	
TBD	Revise computer codes	
TBD	Complete 10 CFR Part 20, regulatory basis	
TBD	Prepare proposed rule	
TBD	Publish final rule	
TBD	Revise Regulatory Guides, NUREGS, Generic Communications, and computer codes	

**QUESTIONS & ANSWERS
REGARDING POTENTIAL CHANGES TO
10 CFR PART 20 REGULATIONS AND GUIDANCE**

Question 1: Which regulations apply to radiation protection?

Answer: Regulations issued by the U.S. Nuclear Regulatory Commission (NRC) are found in Chapter I of Title 10, "Energy," of the *Code of Federal Regulations* ([10 CFR](#)). Chapter I is divided into Parts 1 through 199, which contain requirements that are binding for all individuals and entities that possess, use, or store nuclear materials or operate nuclear facilities under the NRC's jurisdiction. Of these, the regulations that are most relevant to radiation protection are contained in [10 CFR Part 20](#), "Standards for Protection Against Radiation." Additional requirements, specific to particular uses or classes of facilities, are found in other portions of the regulations. For example, Appendix I to 10 CFR Part 50, "Numerical Guides for Design Objectives and Limiting Conditions for Operation to Meet the Criterion 'As Low as is Reasonably Achievable' for Radioactive Material in Light-Water-Cooled Nuclear Power Reactor Effluents," contains additional requirements for effluents (discharges of gaseous or liquid waste) from power reactors. Similarly, [10 CFR Part 35](#), "Medical Use of Byproduct Material," contains requirements related to medical use of radioactive material. For additional detail, see [Radiation Protection](#) and [Regulation of Radioactive Materials](#).

Question 2: When was the last update to the NRC's radiation protection regulations in 10 CFR Part 20?

Answer: The NRC last extensively revised its standards for protection against ionizing radiation, 10 CFR Part 20, in 1991, and the revisions took effect in 1994. The revisions, which were primarily based on recommendations of the International Commission on Radiological Protection (ICRP) from 1977, as detailed in ICRP Publications 26 and 30, included a complete revision of the NRC's regulations, modified the structure of the regulatory requirements, adjusted the limits for occupational and public exposure, and updated the available numerical values for demonstrating compliance. Since that time, the NRC has added other radiation protection amendments and periodically amended related regulations.

Question 3: Why has it been so long since the last time the NRC considered an update of these regulations?

Answer: In 1991, at approximately the same time as the NRC promulgated the final rule revising 10 CFR Part 20, "Standards for Protection Against Radiation," the International Commission on Radiological Protection (ICRP) published revised recommendations in ICRP Publication 60. At that time, the NRC chose not to initiate a new rulemaking, because of the significance of the recently completed revisions of the agency's regulations, and the need to allow time for licensees to implement those revisions. However, 10 years later, in 2001, the NRC staff once again considered the possibility of further revising 10 CFR Part 20, but noted that the ICRP was also considering issuing a new set of recommendations. Consequently, the Commission agreed with the staff's recommendation to defer rulemaking until after the ICRP published its revised recommendations, which were ultimately issued in final form as ICRP Publication 103 in 2007. With that foundation, on December 18, 2008, the NRC staff submitted a Policy Issue Notation Vote Commission Paper, SECY-08-0197, requesting approval to revise the agency's radiation protection regulations and guidance to achieve greater alignment with the 2007 Recommendations of the ICRP, as detailed in ICRP Publication 103. [The NRC's

Synopsis of ICRP Publication 103 discusses the broad implications of the new recommendations.] The Commission subsequently accepted the staff's recommendation through the related Staff Requirements Memorandum (SRM-SECY-08-0197), dated April 2, 2009, instructing the staff to immediately begin engagement with stakeholders and interested parties to initiate development of the technical basis for possible revision of the NRC's radiation protection regulations, as appropriate and where scientifically justified.

Question 4: How can I obtain a full copy of the 2007 Recommendations of the International Commission on Radiological Protection (ICRP)?

Answer: [ICRP Publication 103](#) is available for purchase through the ICRP Web site or from Sage Publications at: <http://ani.sagepub.com>. See [Obtaining the 2007 Recommendations of the ICRP](#) for guidance on how to obtain electronic or print copies.

Question 5: Why is the NRC considering the potential revision of its radiation protection regulations in 10 CFR Part 20?

Answer: The NRC believes that there are a number of considerations that may warrant a revision of the agency's regulatory requirements. For example, important issues identified thus far include inconsistency between the NRC's regulations and those of other Federal agencies, as well as international standards. Other considerations include certain implications of the NRC's requirements, such as the occupational dose limits for workers who may come to the United States from other countries, changes in recommendations for the dose limits for the lens of the eye, and the changes that have occurred in the scientific basis and modeling approaches for calculating dose from various sources.

Question 6: What are other countries doing in the area of radiation protection?

Answer: The [2007 Recommendations of the International Commission on Radiological Protection](#) (ICRP Publication 103) have sparked international reconsideration of radiation protection regulations and guidance, and most countries are considering revisions. The International Atomic Energy Agency (IAEA) has revised the "International Basic Safety Standards for Protection Against Ionizing Radiation and for the Safety of Radiation Sources," and the European Union is updating their European Directive.

Question 7: What are some of the key issues?

Answer: The SECY-12-0064, "Recommendations for Policy and Technical Direction to Revise Radiation Protection Regulations and Guidance," dated April 25, 2012 (ADAMS Accession No. ML121020108) provides policy and technical guidance on potential revisions to the NRC's radiation protection regulations. The NRC staff has identified several key issues for initial discussion with stakeholders to develop a regulatory basis for a potential revision to 10 CFR Part 20. The key issues are potential revisions to: (1) align with the most recent methodology and terminology for dose assessment in ICRP Publication 103; (2) assure that conforming methodology and terminology changes are made throughout NRC regulations; (3) dose limit for the lens of the eye; (4) dose limit for embryo/fetus; (5) alternative approaches to deal with individual protection at or near the current dose limit; (6) address the use of traditional units and international units; and (7) improve reporting of occupational exposure by NRC and Agreement State licensees.

Question 8: What are the anticipated impacts of updating the regulations?

Answer: The nature and extent of impacts will greatly depend on the options that might be used to resolve the key issues discussed above. The ANPR specifically requests information to assist the NRC staff in developing answers to this question. Consequently, the NRC staff is actively engaging stakeholders and interested parties to ensure that we have sufficient knowledge of the potential benefits, burdens, and impacts associated with further alignment of the NRC's existing radiation protection regulations with the [2007 Recommendations of the International Commission on Radiological Protection](#) (ICRP). The NRC will utilize the feedback received from stakeholders and interested parties in drafting the appropriate regulatory basis and recommending rulemaking changes to the Commission.

Question 9: Will the NRC consider options proposed by the public and industry?

Answer: Yes. The NRC will provide opportunities, through the publication of an ANPR, [public meetings](#) and the Web-based overview of [Options to Revise Radiation Protection Regulations and Guidance](#), for stakeholders and interested parties to introduce options, issues, and information for the NRC's consideration. In addition, members of the public and industry stakeholders should feel free to [Contact Us](#) with any related questions or comments.

Question 10: What will the regulatory basis document contain?

Answer: The regulatory basis provides the justification for the potential rulemaking as to whether it is the appropriate action to be taken. It also provides the scientific, technical, legal, or policy information that unequivocally supports the direction and content of any potential rulemaking and provides a foundation for informed decisions to determine whether the rulemaking process continues. In addition, the regulatory basis must provide the overall justification for the NRC's determination that any potential rulemaking is technically sound. This determination is necessary for the NRC to comply with the Administrative Procedure Act, which is the statute that governs the way in which federal agencies may propose and establish regulations.

Question 11: How does the NRC plan on addressing the conforming changes to other parts of the regulations?

Answer: If approved by the Commission, as a part of a separate potential rulemaking effort, the NRC could address other parts of the 10 CFR regulations relative to conforming to ICRP 103 (2007) terminology and methodology. At a minimum, this could include changing organ dose to effective dose; identifying all potential regulation and guidance revisions, and interactions with interested internal and external stakeholders.