

Regulatory Guide Periodic Review

Regulatory Guide Number: **8.10**

Title: **Operating Philosophy for Maintaining Occupational Radiation Exposures as low as is Reasonably Achievable**

Office/Division/Branch: **RES/DSA/RPB**

Technical Lead: **Casper Sun**

Recommended Staff Action: **Revise**

1. What are the known technical or regulatory issues with the current version of the Regulatory Guide (RG)?

The current version of RG 8.10 does not reflect or address the revised regulations in the current 10 CFR Part 20 "Standards for Radiation Protection" and the advances made over the past 39 years in "As Low as is Reasonably Achievable" (ALARA) practices and programs. The existing version of RG 8.10 was written when ALARA was not a regulatory requirement. Since then, 10 CFR Part 20 has been revised to make ALARA a requirement.

2. What is the impact on internal and external stakeholders of not updating the RG for the known issues, in terms of anticipated numbers of licensing and inspection activities over the next several years?

The most significant impact to stakeholders for not updating RG 8.10 would be that the information would not reflect technological changes made over approximately the last four decades in ALARA applications and principles. Most licensees have robust ALARA programs and practices. Since licensees are currently using a very conservative approach to the ALARA program, the outdated version would not significantly impact on how inspections and licensing are conducted. However, the revision will provide the most updated methodology for complying with the regulations.

3. What is an estimate of the level of effort needed to address identified issues in terms of full-time equivalent (FTE) and contractor resources?

A total of 0.2 FTE will be needed. A working group with members from various NRC headquarters and regional offices will have the task of discussing and integrating updates into RG 8.10.

4. **Based on the answers to the questions above, what is the staff action for this guide (Reviewed with no issues identified, Reviewed with issues identified for future consideration, Revise, or Withdraw)?**

Revise Regulatory Guide 8.10 to reflect current regulations, guidance, and practices. One benefit of this action is that the revised guide will reflect current NRC requirements and will provide more up-to-date guidance of licensee ALARA program. The value to NRC staff and its applicants would be the benefits associated with enhanced efficiency and effectiveness in using a common methodology as guidance for license applications and other interactions between the NRC and its regulated entities.

5. **Provide a conceptual plan and timeframe to address the issues identified during the review.**

The draft revision should be available to the public by the fourth quarter of FY 2015.

NOTE: This review was conducted in September 2014 and reflects the staff's plans as of that date. These plans are tentative and subject to change.