Advance Notice of Proposed Rulemaking
10 CFR Part 20

NRC Public Meeting - October 16, 2014

Issue 6 – Reporting of Occupational Exposure

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Current NRC Occupational Dose Reporting Requirements

§ 20.2206 Reports of individual monitoring

- Seven categories of licensees:

(1) nuclear power reactors,
(2) industrial radiographers,
(3) fuel processors (including uranium enrichment facilities), fabricators, and reprocessors,
(4) independent spent fuel storage installations,
(5) manufacturers and distributors of certain byproduct material,
(6) low level waste facilities; and
(7) high level waste facilities

- An annual report to the NRC's Radiation Exposure Information and Reporting System (REIRS) by April 30

Purpose of Reporting Requirements

- **Identification of individuals whose occupational exposures are monitored by more than one licensee;**
- **Evaluation of occupational exposure trends from year to year;**
- **Implementation of corrective effective measures where trends indicate increased radiation exposure;**
- **Development of revisions to radiation protection standards;**

Purpose of Reporting Requirements

- **Evaluation of the risk of radiation exposure associated with activities in NRC licensed facilities;**
- **Assessment of licensee's radiation protection programs; and**
- **Evaluation of the effectiveness of the NRC's regulatory program.**

COMMISSION DIRECTION

- **Improve reporting of occupational exposure by NRC and Agreement State licensees, some of which do not currently submit reports.**

EXISTING REGULATORY FRAMEWORK

- The 37 Agreement States regulate the majority of the radioactive material licensees in this country; approximately 87.5%.
- Agreement States are not required to adopt 10 CFR 20.2206
- Medical licensees along with numerous other categories of NRC radioactive material licensees as identified in the Issue Paper 6 – Charts are not subject to the NRC reporting requirements
- NRC unable to develop an overall assessment of the occupational doses from the various uses of radioactive material
- Extensive cooperation and collaboration between the NRC, the Agreement States, and radioactive material licensees will be needed to address the issue of improve the reporting of occupational exposure.

Proposals

- **Add categories of licensees, e.g., Medical Institution Broad Scope, Academic Type B Broad**
- **Modify adoption requirements for Agreement States**
- **Explore mechanisms for central repository for occupational exposure reporting with user accessibility**

Reporting of Occupational Exposure Questions

Q6-1 What criteria should the NRC use to identify additional categories of licensees that should be required to submit annual occupational exposure reports in accordance with 10 CFR 20.2206(a)?

Q6-2 What are the benefits of collecting occupational exposure information in one central database in order to assess the total annual occupational exposure of those individuals who work at more than one licensed facility or contractor facility during the calendar year and receive occupational exposures at these facilities?

Reporting of Occupational Exposure Questions

Q6-3 Should Agreement States be required to adopt regulations that are compatible with the requirements in 10 CFR 20.2206?

Q6-4 Should the NRC consider a gradual expansion of the 10 CFR 20.2206 licensee reporting categories in a step-wise fashion (e.g., staggered compliance dates for different categories of licensees)?

6-5 What are the potential implementation and operational costs associated with expanding the occupational exposure reporting requirements?

Issue Paper 6 - Charts

PROGRAM CODE	LICENSE CATEGORY AND DESCRIPTION (FROM NUREG-1556, VOLUME 20)	WHAT IS THE AVERAGE ANNUAL OCCUPATIONAL DOSE FOR THIS CATEGORY?	SHOULD THIS LICENSE CATEGORY BE REQUIRED TO SUBMIT TO NRC's REIRS database? (YES OR NO AND WHY OR WHY NOT) (PLEASE ATTACH RESPONSE IF ADDITIONAL SPACE IS NEEDED.)
02300	**Teletherapy** This type of license is issued under 10 CFR 35.13 and is used as a primary Pcode. It authorizes the use of cobalt-60 (Co-60) or cesium-137 for external beam cancer therapy. Many of the teletherapy licensees also have a medical institution license and possess x-ray machines and linear accelerators that are outside the NRC's jurisdiction.		

Summary

- **Comments will be accepted until November 24, 2014**
  - **Federal e-Rulemaking portal at http://www.regulations.gov under Docket ID NRC-2009-0279**
  - **email to Rulemaking.Comments@nrc.gov**
  - **fax to Secretary, U.S. Nuclear Regulatory Commission, 301-415-1101**
  - **mail to Secretary, U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, ATTN: Rulemakings and Adjudications Staff**

http://www.nrc.gov/about-nrc/regulatory/rulemaking/potential-rulemaking/opt-revise.html