



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

August 24, 2016

MEMORANDUM TO: Hubert T. Bell, Inspector General
Office of the Inspector General

FROM: Marc L. Dapas, Director */RA/ S Moore for MDapas*
Office of Nuclear Material Safety
and Safeguards

SUBJECT: RESPONSE TO COMMENT ON MANAGEMENT DIRECTIVE
AND HANDBOOK 10.131, "PROTECTION OF U. S. NUCLEAR
REGULATORY COMMISSION EMPLOYEES AGAINST
IONIZING RADIATION"

In your May 25, 2016, memorandum on the results of the Office of Inspector General's review of Management Directive (MD) 10.131, "Protection of U.S. Nuclear Regulatory Commission (NRC) Employees Against Ionizing Radiation," you provided a comment that the MD contained "... no description, even at a high level, of the framework or nature ..." of Office of Nuclear Material Safety and Safeguards' (NMSS) technical oversight of the NRC's radiation safety program as described in the Organizational Responsibilities and Delegations of Authority section of the MD. Provided below is a description of the technical oversight role and who performs the technical oversight, NMSS's role in the NRC's radiation safety program, and revisions to MD 10.131 which reflect these descriptions.

Technical oversight of the NRC's Radiation Safety Programs is performed by each office and region that has a Radiation Safety Officer (RSO). This technical oversight includes:

- Appoint the RSO,
- Implementing a written radiation safety program that complies with this MD 10.131,
- Oversee employee occupational radiation exposures,
- Attend radiation safety meetings, as appropriate, and
- Review radiation safety audit reports and approve corrective actions.

Regarding the framework of this oversight, each RSO reports to a senior level manager in their organization. For NMSS, Office of Nuclear Reactor Regulation (NRR), Office of New Reactors (NRO) and Office of Nuclear Security and Incident Response (NSIR), the RSO reports to their respective Office Director (OD). For the Technical Training Center, the RSO reports to the Chief Human Capital Officer. In the NRC's four regional offices, the RSO reports to their respective Regional Administrator (RA).

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NMSS has a central role and provides technical resource advice and coordination between the agency's radiation safety programs through its RSO and other technical staff. This includes: lead for the dosimetry contract, the MD 10.131 Working Group, and development of radiation safety forms (e.g., NRC Form 537 "Authorization to Receive an NRC Dosimeter for Headquarters Staff"); the coordinator and facilitator for periodic agencywide RSO meetings and the annual RSO counterpart meeting; the manager for the calibrated survey instruments loaner program and exempt check sources at headquarters; and the development and maintenance of the RSO SharePoint Site. NMSS is also responsible for providing an annual report to the Office of the Executive Director for Operations on the RSO annual counterpart meeting.

Based on this information, we are revising the MD 10.131 to read as follows:

Under Section III.A - the Executive Director for Operations (EDO):

- Responsible for overall development and implementation of standards for protection against ionizing radiation for NRC operations.
- Delegates to the Director of NMSS, responsibility for establishing radiation protection standards and providing technical resource and coordination of the radiation safety programs for NRC employees.
- Delegates the technical oversight of each radiation safety program to the respective Office Director or Regional Administrator for the following offices and regions: NMSS, NRO, NRR, NSIR, Office of the Chief Human Capital Officer, and Regions I, II, III, and IV. [NOTE: The senior level manager for the office or region manages their respective radiation safety program and thus provides technical oversight of the program.]

Under Section III.B-D, F, G, and I - each OD/RA that has an RSO/radiation safety program:

- Ensures technical oversight of the radiation safety program by appointing an RSO; implementing a written radiation safety program that complies with this MD; overseeing employee occupational radiation exposures; attending radiation safety meetings, as appropriate; and reviewing radiation safety audit reports and approving corrective actions.

In addition, under Section III. B - NMSS OD:

- Establishes radiation protection standards and provides technical resource and coordination of the radiation safety programs for NRC employees.

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