

D911017

Mr. James M. Taylor  
Executive Director for Operations  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Dear Mr. Taylor:

SUBJECT: REGULATORY GUIDES BEING DEVELOPED IN SUPPORT OF THE  
REVISED 10 CFR PART 20

During the 378th meeting of the Advisory Committee on Reactor Safeguards, October 10-12, 1991, we discussed the four referenced draft Regulatory Guides, related to the implementation of the revised 10 CFR Part 20, "Standards for Protection Against Radiation," for which we have the lead responsibility. Our Subcommittee on Occupational and Environmental Protection Systems and a Working Group of the Advisory Committee on Nuclear Waste (ACNW) discussed these guides, together with eight other guides in this area for which the ACNW has the lead responsibility, during a joint meeting on September 23 and 24, 1991. During this review, we had the benefit of discussions with representatives of the NRC staff and NUMARC and of the documents referenced.

This letter summarizes our general comments on these four proposed Regulatory Guides. Detailed discussions of our concerns occurred during the September 24, 1991 session, and are available in the transcript of that meeting. We understand that we will have the opportunity to review these guides after the public comments have been reconciled.

1. Draft Regulatory Guide DG-8004, "Radiation Protection Programs for Nuclear Power Plants"

This proposed guide collects and organizes material in one place that has been previously published in several other regulatory guides, for example, Regulatory Guides 8.2, 8.8, and 8.10. This proposed guide covers the important features of a radiation protection program for nuclear power plants. On the other hand, existing power plants already have radiation protection programs that presumably meet the intent of the revised 10 CFR Part 20. It is not evident that the advantages of this consolidated approach outweigh the disadvantage of creating an additional set of criteria for judging licensee performance.

2. Draft Regulatory Guide DG-8006, "Control of Access to High and Very High Radiation Areas in Nuclear Plants"

This proposed guide not only offers guidance on the implementation of Sections 1101, 2102, 1601, and 1602 of the revised 10 CFR Part 20, but also collects other recommendations contained in earlier NRC Bulletins that were issued after mishaps, or near mishaps, in high and very high radiation

areas. This proposed guide adequately covers the important features of a program for controlling access to such areas. It also provides (new) guidance on diving operations. As in the preceding paragraph, much of the material in this proposed guide is available elsewhere, for example, technical specifications and the rule itself. Nevertheless, we believe a regulatory guide, generally written as proposed, will be somewhat beneficial.

3. Draft Regulatory Guide 8.N6, "Planned Special Exposures"

This proposed guide offers guidance on the implementation of Section 1206 of 10 CFR Part 20 (as well as some other related sections) dealing with infrequent, pre-planned radiation exposures in excess of routine regulatory limits, deemed necessary because of some exceptional circumstances. This proposed guide addresses the important features of such planned special exposures. We believe that it will be useful to issue a regulatory guide, generally written as proposed, in this area.

4. Draft Regulatory Guide 8.7, Revision 1, "Instructions for Recording and Reporting Occupational Radiation Exposure Data"

This proposed revision contains instructions on the record-keeping and reporting requirements of the revised 10 CFR Part 20, with detailed instructions on filling out NRC Form 4 (Occupational Radiation Exposure History) and NRC Form 5 (Occupational Exposure Record for Current Year). We do not have an opinion on the substance of the proposed guide, but do agree with the staff that a guide is necessary.

We are aware that the Advisory Committee on Nuclear Waste plans to send you a letter on its review of the regulatory guides in support of the revised 10 CFR Part 20. We agree with its conclusion that the scheduled date for implementation of the revised regulation may be unrealistic.

Sincerely,

David A. Ward  
Chairman

References:

1. U.S. Nuclear Regulatory Commission, Draft Regulatory Guide DG-8004, "Radiation Protection Programs for Nuclear Power Plants," September 1991
2. U.S. Nuclear Regulatory Commission, Draft Regulatory Guide DG-8006, "Control of Access to High and Very High Radiation Areas in Nuclear Power Plants," September 1991
3. U.S. Nuclear Regulatory Commission, Draft Regulatory Guide 8.N6, "Planned Special Exposures," August 7, 1991
4. U.S. Nuclear Regulatory Commission, Draft Regulatory Guide

8.7, Revision 1, "Instructions for Recording and Reporting  
Occupational Radiation Exposure Data," September 17, 1991