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February 16, 2017

Mr. William M. Dean
Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Mr. Edwin M. Hackett
Acting Director
Office of Nuclear Regulatory Research
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: New NRC Expectations Contained in Regulatory Guide 8.7, Revision 3, "Instructions for Recording and Reporting Radiation Dose Data"

Project Number: 689

Dear Messrs. Dean and Hackett:

I am writing to express industry's continuing concern with Revision 3 to Regulatory Guide 8.7, "Instructions for Recording and Reporting Occupational Radiation Dose Data."¹ Revision 3 interprets the requirements in 10 CFR § 20.1502 governing the monitoring of external and internal occupational doses in a way that is substantially different from the long-standing interpretation provided in previous versions of Regulatory Guide 8.7, as well as in the current iteration of Regulatory Guide 8.34.² This new or different interpretation of section 20.1502, as described in Revision 3 to Regulatory Guide 8.7, was not made available for public comment, is inconsistent with decades of industry practice that the NRC previously accepted as sufficient to meet the requirements of section 20.1502, and represents an unanalyzed backfit that does not meet the requirements in 10 CFR § 50.109.

¹ "Instructions for Recording and Reporting Occupational Radiation Dose Data," Regulatory Guide 8.7, Rev. 3 (Nov. 2016) ("Revision 3").

² "Monitoring Criteria and Methods to Calculate Radiation Occupational Radiation Doses," Regulatory Guide 8.34 (July 1992) ("Regulatory Guide 8.34").

Messrs. Dean and Hackett

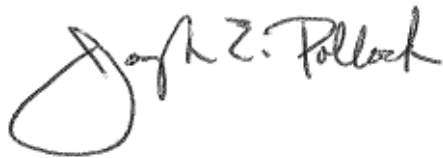
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Given these concerns, we respectfully request that the NRC withdraw Revision 3 and cease any efforts currently underway to conform Regulatory Guide 8.34 to the new and different interpretation provided in Revision 3. Our concerns with Revision 3 are discussed in greater detail in the attachment to this letter. For completeness, it should be recognized that NRC licensees other than nuclear power plants rely on Regulatory Guides 8.34 and 8.7, e.g., fuel cycle facilities.

We appreciate your consideration of the industry's perspectives and we would welcome the opportunity for further interactions with the NRC staff on this matter. Please contact Janet Schlueter at (202) 739-8098; jrs@nei.org or Ellen Anderson at (202) 739-8043; exa@nei.org, if you require information concerning these comments.

Sincerely,

A handwritten signature in black ink that reads "Joseph E. Pollock". The signature is written in a cursive style with a large, looped initial "J".

Joseph E. Pollock

Attachment

c: Margaret Doane, NRC/OGC
NRC Document Control Desk