

# PUBLIC SUBMISSION

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**Docket:** NRC-2017-0205

Instructions for Recording and Reporting Occupational Radiation Dose Data

**Comment On:** NRC-2017-0205-0001

Guidance: Instructions for Recording and Reporting Occupational Radiation Dose Data

**Document:** NRC-2017-0205-DRAFT-0004

Comment on FR Doc # N/A

## Submitter Information

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## General Comment

In DG-8056, Section 1.1 (If Monitoring is Not Required), the following is stated:

"If monitoring of the occupational intake of radioactive material and assessment of the CEDE is not being performed, then licensee evaluations of subsequent minor intakes that were anticipated based on the prospective dose evaluation or pre-job evaluations is not required monitoring. However, dose assessments performed to quantify unanticipated intakes or exposures are considered required monitoring, regardless of the magnitude of the resulting doses, and results must recorded and reported accordingly."

Specifically, the statement on recording and reporting dose assessments for quantifying unanticipated intakes or exposures should be revised. This section states it is required "regardless of the magnitude of the resulting doses". This appears to be a contradiction of Regulatory Guide 8.34, Section 1.4. This section states, "Surveys and monitoring results that serve as confirmatory measures are not subject to the individual recordkeeping requirements

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of 10 CFR 20.2106(a) provided such results confirm that actual individual doses are less than 10% of the limits."

While "confirmatory measures" is not defined in 10 CFR 20, the term "survey" is defined. Specifically, the definition of survey is "an evaluation of the radiological conditions and potential hazards incident to the production, use, transfer, release, disposal, or presence of radioactive material or other sources of radiation. When appropriate, such an evaluation includes a physical survey of the location of radioactive material and measurements or calculations of levels of radiation, or concentrations or quantities of radioactive material present."

Through these definitions, it appears the two Regulatory Guides contradict on whether or not doses for such confirmatory measurements and calculations are required to be assigned. Industry practice on this topic is also not consistent with what is stated in the draft guidance presented. Since the requirements in 10 CFR 20.1502 have not been revised, it is unclear why the interpretation of this regulation is being revised through this draft guidance. Therefore, the draft guidance should be revised to remove the requirement for recording calculated doses "regardless of the magnitude" (as described above) and reflect what is found in Reg Guide 8.34, 10 CFR 20.1502 and industry practice.

NOTE: one additional, non-technical error was identified. Also in the statement quoted above from Section 1.1 of DG-8056, the last sentence appears to be missing the word "be" between "must" and "recorded".

Currently: "...regardless of the magnitude of the resulting doses, and results must recorded and reported accordingly."

Corrected: "...regardless of the magnitude of the resulting doses, and results must be recorded and reported accordingly."

Comments also attached via Word document.

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## Attachments

DG-8056 Comments - Jack Kraus DBNPS

In DG-8056, Section 1.1 (If Monitoring is Not Required), the following is stated:

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Specifically, the statement on recording and reporting dose assessments for quantifying unanticipated intakes or exposures should be revised. This section states it is required "regardless of the magnitude of the resulting doses". This appears to be a contradiction of Regulatory Guide 8.34, Section 1.4. This section states, "Surveys and monitoring results that serve as confirmatory measures are not subject to the individual recordkeeping requirements of 10 CFR 20.2106(a) provided such results confirm that actual individual doses are less than 10% of the limits."

While "confirmatory measures" is not defined in 10 CFR 20, the term "survey" is defined. Specifically, the definition of survey is "an evaluation of the radiological conditions and potential hazards incident to the production, use, transfer, release, disposal, or presence of radioactive material or other sources of radiation. When appropriate, such an evaluation includes a physical survey of the location of radioactive material and measurements or calculations of levels of radiation, or concentrations or quantities of radioactive material present."

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Comments respectfully submitted by:  
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