Regulatory Guide Number: **8.23, Revision 1**

Title: **Radiation Safety Surveys at Medical Institutions**

Office/Division/Branch: **RES/DSA/RPB**

Technical Lead: **Vered Shaffer**

SUBJECT: **Basis for Withdrawal**

1. What regulation(s) did the Regulatory Guide support?

Regulatory Guide (RG) 8.23 was published in January 1981 to provide guidance on the types and frequencies of surveys that are acceptable to the NRC staff for use in medical institutions and to comply with 10 CFR Part 20, "Standards for Protection Against Radiation."

2. What was the purpose of the Regulatory Guide?

This guide identified the types and frequencies of surveys that are acceptable to the NRC staff for use in medical institutions using radioactive materials for purposes of diagnosis, therapy, or human research involving the administration of radioactive materials or radiation to patients.

3. How was the Regulatory Guide used?

The intention of RG 8.23 was to provide prescriptive information about the types and frequencies of surveys to be performed by applicants and licensees of medical institutions.

4. Why is the Regulatory Guide no longer needed?

The regulations in 10 CFR Part 20 were revised since 1981 and became less prescriptive. The prescriptive guidance in RG 8.23 is not needed since the amended regulations deleted several of the specific survey requirements applicable to medical institutions.

5. What guidance is available once the Regulatory Guide is withdrawn?

NUREG-1556 Volume 9, “Consolidated Guidance About Materials Licenses Program-Specific - Guidance About Medical Use Licenses,“ contains general guidance for medical licensees that need to perform surveys at medical facilities.

In addition, RG 8.18, “Information Relevant to Ensuring that Occupational Radiation Exposures at Medical Institutions Will Be as Low as Reasonably Achievable,” includes specific examples of radiation protection surveys in order to achieve occupational doses and doses to members of the public that are as low as is reasonably achievable.

Although withdrawn, RG 8.23 is available as a reference by licensees should they desire prescriptive guidance. Licensees should note that the amendment to 10 CFR Part 20 resulted in some of the RG citations to the regulations being made incorrect. In addition, the guidance and assessment methods described in RG 8.23 are not consistent with current technology and most of the references in the guide are not available or they are outdated.

6. Is the Regulatory Guide referenced in other documents and what are the "ripple effects" on these documents if it is withdrawn?

RG 8.23 is referenced in the following RGs:

- RG 8.15, "Acceptable Programs for Respiratory Protection,"
- RG 8.18, "Information Relevant to Ensuring that Occupational Radiation Exposures at Medical Institutions Will Be as Low as Reasonably Achievable," and
- RG 8.25, "Air Sampling in the Workplace."

These RGs only list RG 8.23 as a reference and do not discuss RG 8.23 in any substantive manner.

NUREG-1556, Volume 9, also contains a list of several RGs as references, including RG 8.23; however, it is not mentioned in the text of NUREG-1556.

Some licensees may have included this guidance in their licensing basis. Although a RG is withdrawn, current licensees may continue to use it, and withdrawal does not affect any existing licenses or agreements. Withdrawal means that the guide should not be used for future NRC licensing activities.

7. What is the basis for believing that no guidance similar to that in the Regulatory Guide will ever be needed?

The staff does not intend to require prescriptive guidance on surveys for medical institutions since the regulations in 10 CFR Part 20 applicable to these licensees no longer require prescriptive surveys.

8. Will generic guidance still be needed?

Generic guidance is not needed because the regulations are performance based. General guidance will still be available. NUREG-1556 Volume 9, contains general information on guidance related to surveys at medical facilities. Although prescriptive guidance will not be needed for medical institutions, RG 8.18 includes specific examples of radiation protection surveys in medical institutions.

9. What is the rationale for withdrawing this Regulatory Guide instead of revising it?

The information in the guide is no longer required by the current regulations and it will not be used for future licensing actions. There will be no impact on either internal or external stakeholders when this guide is withdrawn.

10. Do other agencies rely upon the Regulatory Guide, e.g., the Agreement States, National Aeronautical and Space Administration, Department of Energy?

The staff is unaware of any other agency or an Agreement State that uses or relies on this guidance.