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General Comment

Regulatory Guide (RG) 1.142 Revision 2 contains Regulatory Position 2, which states that:
"This position emphasizes the need to evaluate concrete structures for their effectiveness as radiation shields, when they are so intended. Some specific guidance for this purpose may be obtained from ANSI/ANS 6.4-1997. This is the current ANSI standard for radiation shielding."

This proposed version of RG 1.142 deleted this statement.

Structural concrete is frequently used as radiation shielding to limit dose to members of the public, and plant workers, both during normal operation, as well as during design basis events.

The concrete, or other structural materials may not be explicitly identified in the FSAR as required radiation shielding material. However, it may be used as part of the analysis used to demonstrate compliance with 10 CFR 20.1301(e), GDC 4, GDC 19, GDC 23, 10 CFR 50.49(d)(3),

10 CFR 50.49(e)(4), 10 CFR 50.34(f)(2)(vii) ,
10 CFR 50.34(f)(2)(viii), 10 CFR 50.34(f)(2)(xxviii),
10 CFR 50.67(b)(2)(iii) and 10 CFR 50.44(b)(3).

The fact that these structures provide other protective functions of safety related structures systems and components, and protection of members of the public needs to be an integral part of guidance to users provided by the staff.

This position should be included in Revision 3.
"This position emphasizes the need to evaluate concrete structures for their effectiveness as radiation shields, when they are so intended. Some specific guidance for this purpose may be obtained from ANSI/ANS 6.4-1997. This is the current ANSI standard for radiation shielding."