UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

OFFICE OF THE
SECRETARY

November 30, 1978

MEMORANDUM FOR: Lee V. Gossick, Executive
Director for Operations

FROM: Samuel J. Chilk, Secretary

SUBJECT: SECY-78-415 - OCCUPATIONAL EXPOSURE STANDARDS
(CONSENT CALENDAR ITEM)

Based on its review of SECY-78-415 and related documents and its discussions with the staff, and in the light of other developments with respect to the matter of occupational exposure standards, the Commission concludes that a number of actions should be undertaken:

A. With respect to individual dose limitations:

1. The staff should undertake expeditiously to prepare for and initiate a public hearing on issues concerning the adequacy of present radiation protection occupational standards for exposure of individuals. This effort should take into account, where pertinent, considerations developed in other relevant contexts, including recent House and Senate hearings and the current HEW-led interagency study.
(SECY Suspense: March 15, 1979)

2. The staff should undertake to hold the hearing jointly with EPA. The staff should provide their views as to whether participation by other relevant Federal agencies is desirable.
(SECY Suspense: December 15, 1978)

3. The staff should develop for Commission review and approval a revised Notice of Hearing, the scope of which should include as a minimum the issues and proposals identified in the NRDC petition as well as the staff's response and alternative proposals. In particular, the scope should include the issue of age-dependent dose limitation. The report of the NAS-BEIR committee--expected in spring--should be included unless its availability would unduly delay the completion of the hearings.
(SECY Suspense: January 19, 1979)

4. The Staff should provide the Commission an analysis of the advantages and disadvantages of the alternative forms for the hearing, including the need to provide adjudicatory rights, such as discovery. (SECY Suspense: January 19, 1979)

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5. The staff should develop for Commission review and approval a revision of the notice of proposed amendments related to eliminating the use of the 5(N-18) formula. The revised notice should state the reasons for going forward with this change prior to the planned hearing, but should clearly request that comments address the desirability of including this proposed change within the scope of the planned hearing.
(SECY Suspense: December 18, 1978)

B. With respect to ALARA controls on collective dose:

The Commission believes that the matter of ALARA programs for control of occupational exposure can and should be dealt with as entirely separate rulemaking matter. The Commission supports the full implementation of the ALARA concept in the control of occupational exposure. However, before approving the publication of the staff's proposed amendments to the regulations to make ALARA more readily enforceable, the Commission requests further information to demonstrate that the guidance and criteria the staff would use is likely to be the most effective way to implement the proposed regulations. In particular, the Commission requests a staff analysis of possible contrasting approaches using more explicit or quantitative criteria in deciding when a licensee's program is ALARA. Among the approaches the staff is to analyze are extension of the use of the dollar-per-man-rem value used for reactor effluent exposure evaluations, the use of specific man-rem limits and/or design objectives for appropriate categories of exposure, and combinations of these alternatives in conjunction with the general qualitative approach that relies on staff judgment. The staff should identify what additional resources would be needed and how long it would take to develop specific guidance and criteria for implementing ALARA. The staff should discuss both the availability of manpower and the timing of guidance availability. The response to this request should be provided at the same time as the response to Chairman Hendrie's request made in my memorandum to you of August 23, 1978.
(SECY Suspense: January 19, 1979)

cc:
Chairman Hendrie
Commissioner Gilinsky
Commissioner Kennedy
Commissioner Bradford
Commissioner Ahearne
Acting General Counsel
Director, Policy Evaluation
Director, Congressional Affairs
Director, Public Affairs
Director, Standards Development