

DISTRIBUTION:

Central File	L. Battist, SD
SD RDG/ALPHA	E. Branagan, NRR
RHSB RDG/Subject	L. Rouse, NMSS
Minogue	P. Loysen, NMSS
Smith	J. Kastner, NMSS
Goller	
Alexander (AD)	
Parsont	
Peterson	

MAY 6 1980

MEMORANDUM FOR: Joanna Becker
Office of the Executive Legal Director

FROM: Harold T. Peterson, Jr.
Office of Standards Development

SUBJECT: NRC AUTHORITIES TO SET LIMITS ON DOSES TO MEMBERS OF
THE GENERAL POPULATION

In reviewing the considerations for amending 10 CFR Part 20, I realized that Reorganization Plan No. 3 of 1970, which created EPA, may affect our ability to set dose limits for non-uranium fuel cycle (UFC) licensees. As that Plan transferred to EPA the AEC authorities for setting generally applicable environmental radiation standards, we may not have authority for setting such dose limits independently of EPA.

Accordingly, I would appreciate it if you would review these authorities to determine:

1. Whether we could set, through rulemaking, general dose limits for members of the general population from non-UFC licensees.
2. Whether we could set such dose limits if they applied to specific classes of licensees, (if they were not "generally applicable").
3. Whether, in lieu of dose limits, we could set effluent release (curie) limits either generally or for specific classes of licensees.
4. If none of the above options do not appear feasible, ~~we~~ are there any options for other types of standards that we could employ independently of EPA (for example, numerical design objectives similar to those for LWR's in Appendix I to 10 CFR Part 50)?

Prompt resolution of these issues is necessary before we proceed too far in developing the environmental protection rationale for revision of 10 CFR Part 20. I would appreciate at least some preliminary guidance on these points by the end of this month.

ORIGINAL SIGNED BY
HAROLD T. PETERSON, JR.

Harold T. Peterson, Jr.
Radiological Health Standards Branch
Office of Standards Development

TASK NO: *RH-705-1*

OFFICE	RHSB/RHSS/SD	RHSB/RHSS/SD			
SURNAME	HTPeterson/pg	MParsont			
DATE	5/6/80	5/7/80			