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General Comment

See attached file(s)

Attachments

ROP-SECY-19-0067-NRDC-Comment

October 7, 2019

Office of Administration,
Mail Stop: TWFN–7–A60M
U.S. Nuclear Regulatory Commission,
Washington, DC 20555–0001
ATTN: Program Management

Re: ROP Enhancement and Docket ID NRC–2019–0155

Comments on: SECY-19-0067 - Recommendations for enhancing the reactor oversight process
Docket Number: NRC-2019-0155

I. NRDC Statement of Interest

NRDC is a national non-profit environmental organization with over one million combined members and activists. NRDC's activities include maintaining and enhancing environmental quality and monitoring federal agency actions to ensure that federal statutes enacted to protect human health and the environment are fully and properly implemented. Since 1970, NRDC has sought to improve the environmental, health, and safety conditions at the civil nuclear facilities licensed by the NRC, and we will continue to do so. We are pleased with this opportunity to comment on SECY-19-0067 particularly on proposed options in NRC's reactor oversight process.

II. NRDC's comment

As part of a recommendation to improve NRC's inspection program, NRC's staff considered three options in SECY-19-0067:

1 a. Revise inspection procedures to modify sample sizes and resource estimates for the reactor safety inspections; eliminate IP 71124.02, "Occupational ALARA [As Low as Reasonably Achievable] Planning and Controls," from the radiation protection inspection program; no change to the frequency of the biennial problem identification and resolution (PI&R) inspection prior to the comprehensive review of the PI&R inspection program.

1 b. Revise inspection procedures to modify sample sizes and resource estimates for the reactor safety inspections, eliminate IP 71124.02 from the radiation protection inspection program; and revise the frequency of the biennial PI&R inspection to triennial prior to the comprehensive review of the PI&R inspection program.

2. Evaluate reductions in minimum inspection sample requirements for sustained good license performance.

NRDC opposes the elimination of IP 77124.02 from the radiation protection inspection program. The inspection basis for 71124.02 states:[1]

"Title 10 of the Code of Federal Regulations (10 CFR) Section 20.1101(b) requires that licensees use, to the extent practical, procedures and engineering controls based on sound radiation protection principles to achieve occupational doses that are as low as is reasonably achievable (ALARA). Performance in this area is judged on whether the licensee has taken appropriate measures to track, and if necessary, to reduce exposures and not on whether each individual exposure and dose represent an absolute minimum, or whether the licensee has used all possible methods to reduce exposures. The stochastic risk effect of exposure is based on the linear no-threshold exposure model. Increasing individual or collective exposures equates to increased risk of cancer or genetic effects. Licensees are required to manage these risks to ALARA levels. This inspectable area verifies aspects of the Occupational Radiation Safety Cornerstone for which there are no indicators to measure performance."

As defined in the Code of Federal Regulations (10 CFR 20.1003), ALARA means making every reasonable effort to maintain exposures to radiation as far below the dose limits.[2] ALARA has been and must continue to be a key inspection criterion in the U.S. NRC's regulatory framework to ensure that workers are not exposed to unnecessary levels of radiation in the process of routine civilian nuclear reactor operations. ALARA is a radiation safety principle that has successfully limited workers' radiation exposure for decades. Eliminating IP 71124.02 from the reactor oversight process will have a negative impact on monitoring licensee performance in implementing the ALARA principle in their routine operations.

Sincerely,

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[1] https://www.nrc.gov/docs/ML1728/ML17286A285.pdf
[2] https://www.nrc.gov/reading-rm/doc-collections/cfr/part020/part020-1003.html