



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

COMMISSION
CORRESPONDENCE

September 9, 1980

Dr. George R. Holeman, Chairman
Radiation Protection Committee
American Association of Physicists
in Medicine
Yale University
260 Whitney Avenue
New Haven, Connecticut 06520

Dear Dr. Holeman:

Your letter of July 14, 1980 expressed several concerns the American Association of Physicists in Medicine (AAPM) has with the Model ALARA Program for Medical Facilities described in W. J. Dircks' letter of June 16, 1980 to all NRC medical licensees. You requested that the Commission rescind the letter. Your concerns appear to be based on a misunderstanding of certain aspects of the Model ALARA Program. I hope that I can clarify the matter for you.

First, let me address your concern that NRC is lowering the permissible occupational exposure limit for medical workers. This is not being done. The concept of "Investigational Levels" is introduced to provide exposure check points above which further investigation -- by the licensee, not NRC -- is justified. They are not new dose limits, nor should they have the effects of limits. The intent is to provide licensee management with a tool for maintaining occupational exposures as low as reasonably achievable. Even though the maximum individual exposures are not required to be reduced, we do anticipate that licensee investigations of occupational exposures above the "Investigational Levels" (but below the maximum permissible levels) will result in reducing average occupational exposures. In its compliance role, NRC will not take issue with whether an Investigational Level has been exceeded, but rather whether the exposure was investigated by the licensee to determine that it was indeed ALARA.

The Model ALARA Program for Medical Facilities does not involve any changes in NRC regulations or in NRC policy. Its purpose is to improve NRC procedures to assure licensee application of ALARA principles, as called for in 10 CFR Part 20 as well as in regulations relating to licensee qualifications (e.g., 10 CFR §35.14(a)(5)). Mr. Dircks, as Director of Nuclear Material Safety and Safeguards, is responsible for implementing the ALARA principles.

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The Program has been the subject of a request for public comments. In response to our request for clearance of the application and record-keeping requirements associated with the Model ALARA Program, the General Accounting Office published a notice in the Federal Register (44 FR 58966, October 12, 1979) announcing the Program and requesting public comment. On November 16, 1979, GAO suspended clearance of the Program to give NRC sufficient time to respond to comments which had been received and to provide GAO an opportunity to review NRC's response. As a result of the comments received, NRC significantly revised the Program. Upon receipt of the revised Program from NRC, GAO published a second notice in the Federal Register (45 FR 21040, March 31, 1980) requesting written comments from all interested persons, organizations, public interest groups, and affected businesses on the revised Model ALARA Program for Medical Facilities.

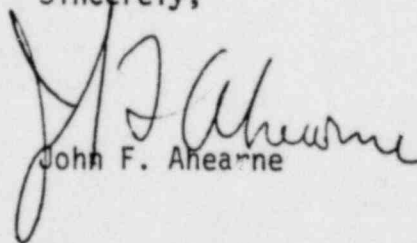
I believe the two comment periods provided ample opportunity for public comment. In addition, I understand that the staff had several meetings in which representatives of the AAPM were present and commented (as individuals) on details of the proposed ALARA Program.

As you noted, no public hearings on the Model ALARA Program have been held. Hearings were not required. While NRC has sponsored public meetings or workshops to secure greater public input to proposed regulatory guides or programs that have widespread public interest, because of the specialized nature of the Model ALARA Program as well as the involvement of only one category of licensees, solicitation of individual comments was considered a more appropriate procedure.

The maintenance of occupational radiation exposure levels as low as reasonably achievable is a primary NRC objective which the Model ALARA Program for Medical facilities is intended to support. ALARA programs exist for nuclear reactor licensees and are being developed for other categories of NRC material licensees.

I trust that the above has answered your questions.

Sincerely,


John F. Ahearne