



OFFICE OF THE
SECRETARY

UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555
February 24, 1981

IN RESPONSE
REFER TO 880-186/
S78-415



MEMORANDUM FOR: William J. Dircks, Executive Director
for Operations

FROM: Samuel J. Chilk, Secretary

SUBJECT: SECY-80-186 - SECY-78-415, "FURTHER
ACTIONS TO CONTROL RISK ASSOCIATED
WITH OCCUPATIONAL RADIATION EXPOSURES
IN NRC-LICENSED ACTIVITIES"

This is to advise you that the Commission (with all Commissioners concurring) has approved the qualitative regulatory approach to the implementation of occupational ALARA programs by licensees as set forth in the subject papers. In developing the proposed rule, staff should include the following items. The proposed rule should also request comments on any alternative to these items which also accomplish their primary purpose.

- ° Staff's preference for structuring the proposed rule to require licensees to develop and submit individual radiation protection programs which incorporate means for maintaining radiation exposures ALARA as a major component, rather than only requiring ALARA programs, is accepted.
- ° The proposed rule should include a requirement for affected licensees to establish annual collective dose objectives and to submit an annual report which (1) documents the collective dose for the previous year, (2) provides an appraisal of the effectiveness of their occupational ALARA program, and (3) sets forth the collective dose objectives for the ensuing year. Such objectives should be based upon the licensee's operating experience and knowledge of activities planned for the coming year, as well as the successful implementation of their occupational ALARA programs. The report should include an explanation with respect to any collective dose objective that was exceeded during the year. The report should also include sufficient information on personnel dose data for specific, generically-applicable tasks to permit the staff

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to concentrate regulatory attention on appropriate activities and to facilitate future considerations of quantitatively-based ALARA requirements. This report is to be posted in each affected licensee's establishment.

The proposed rule should include a requirement for affected licensees to submit a separate report for any major non-routine task, such as a steam generator replacement, which will cause a collective dose larger than a stated threshold. Such reports should describe the manner in which the licensee will apply the methods detailed in the individual radiation protection-ALARA program to the conduct of the specific major activity and should set forth a collective dose objective for the activity. The report should be submitted at least 20 days prior to commencement of the activity; NRC approval would not be required prior to commencement of the activity.

In developing the proposed rule, staff should consider including the following items. The paper forwarding the proposed rule for Commission action should discuss the rationale for including or not including these items and, where appropriate, should discuss alternatives for accomplishing the primary purpose of the item. The items to be considered are:

Staff should consider incorporating the individual radiation protection programs into the facility license. The manner in which individual programs are incorporated into licenses should be consistent for all licensees unless there are good reasons for varying. In this regard, the proposed rule should provide for sufficient flexibility to allow minor changes in individual programs to be effected without the need for a license amendment.

Where justified by the potential hazard, licensees should be required to establish an in-house advisory capability (preferably a committee) responsible for advising management on radiation protection, including ALARA, measures.

Reporting of any non-routine task which is predicted to cause a specified number of manrems (e.g., 10 manrems) in advance to the radiation protection committee, along with a collective dose objective

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for the task. The committee should review the task and recommend actions to maintain occupational exposures ALARA. If the collective dose objective is exceeded by a fixed percentage (e.g. 30% or more), a documented explanation should be submitted to the committee.

- ° At nuclear power plants, reporting in advance to the in-house radiation protection committee of any periodic routine task which is predicted to cause more than a specified collective dose over the projected lifetime of the plant. The committee should review the task and recommend actions to maintain occupational exposures ALARA.
- ° Prominent display in each radioactive area of the ALARA policy for occupational exposures, the makeup of the advisory committee and the projected annual goal and the performance against that goal.
- ° A requirement that all licensees submit an annual report of radiation exposures of all individuals for whom personnel monitoring is required.

It is requested that you provide a Commission paper containing a discussion of the above items, a proposed rule change, and supporting regulatory guidance to the Office of the Secretary within four months from the date of this SECY memorandum.

cc: Chairman Ahearne
Commissioner Gilinsky
Commissioner Hendrie
Commissioner Bradford
Commission Staff Offices
Director, Standards Development

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