



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION II  
101 MARIETTA ST., N.W., SUITE 3100  
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MEMORANDUM FOR: C. R. Stephens, Chief, Docketing and Service Branch  
Office of the Secretary of the Commission

FROM: A. F. Gibson, Chief, Technical Inspection Branch  
Division of Engineering and Technical Programs

SUBJECT: REGION II COMMENTS ON SECOND PROPOSED REVISION TO  
REGULATORY GUIDE 8.8

DOCKET NUMBER  
PROPOSED RULE *PR-Misc. Not*  
*(Reg. Guide)*

Region II comments on the proposed revision to the subject regulatory guide are provided in the enclosure to this memorandum.

*A. F. Gibson*  
A. F. Gibson

Enclosure:  
As stated

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## ENCLOSURE

### Paragraph 1.2, Page 10

This paragraph should be revised to formally assign the ALARA program to a technically qualified person or organizational component as a major responsibility, with a sufficiently high reporting level, and with adequate resources. This individual or organizational component should have adequate authority and direct communication lines to upper management. The ALARA Committee should only be an advisory group.

### Paragraph 1.2, Page 11

Subparagraph 1 - Rather than recommending that annual collective dose goals be considered, the Guide should indicate that this should be an integral part of the ALARA program. The licensee should establish realistic goals and strive to reach these goals.

Subparagraph 3 - The effectiveness of the ALARA program, as determined by the measurement system results should be reviewed by senior facility management, as well as corporate management. Responsibility delineated in this paragraph should not be the sole responsibility of the radiation protection manager.

### Paragraph 1.3, Page 13

The training and qualification of station personnel should follow the guidance contained in NUREG 0761, Radiation Protection Plan.

This section should specify that station personnel will be trained in specific methods that they could use to minimize their own exposure, in addition to reviewing the station ALARA program.

### Paragraph 2.2, Page 18

This paragraph should address the exposure of individuals installing, maintaining, and removing temporary shielding. The exposure received by these individuals may far outweigh that saved by others working in the area.

This paragraph should also address the requirement to perform a safety evaluations prior to installing shielding on piping of operating safety related systems.

### Paragraph 2.8, Page 26

This paragraph should discuss having procedures to require that the flow through resin and sludge treatment systems be verified prior to actual transfer of radioactive material.

This paragraph should also discuss minimizing the use of flexible hose (non-reinforced type) in systems that could be pressurized.

Paragraph 3, Page 30

NUREG 0761 and Lessons Learned in Health Physics Appraisal Program, NUREG-0855, should be discussed in this paragraph.

General Comments

1. The NRC should consider separating ALARA concepts for design of nuclear facilities and those important for an operating plant. Reg. Guide 8.8 should only address information relative to ensuring their occupational exposure at operating nuclear power stations will be ALARA.
2. The format of Reg. Guide 8.8 should be changed so that it is similar to Department of Energy publication DOE/EV/1830-TS, A Guide to Reducing Radiation Exposure to As Low As Reasonably Achievable. This publication provides specific guidance for establishing an ALARA program and specific methods for reducing exposure rather than just philosophy as does Reg. Guide 8.8.