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MEMORANDUM FOR: William J. Dircks
 Executive Director for Operations

FROM: Victor Stello, Jr., Chairman
 Committee to Review Generic Requirements

SUBJECT: MINUTES OF CRGR MEETING NUMBER 25

The Committee to Review Generic Requirements met on Tuesday, November 16, 1982, from 1-4 p.m. A list of attendees is enclosed.

- (1) W. Mills (RES) briefed the Committee concerning development of the proposed major revision to 10 CFR Part 20, Standards for Protection Against Radiation.

The staff indicated that there are two primary reasons for the proposed revision. First, the radiation protection requirements have been amended many times since the regulation was promulgated in 1957. These amendments have affected many features of the existing Part 20 and have resulted in ambiguities and inconsistencies. Second, and of much greater importance, is the need to revise Part 20 to reflect the use of health risks as a basis for radiation protection standards.

Highlights of the proposed revision were reported to the Committee as follows:

- (a) Summation of internal and external dose (Currently, internal and external doses are treated separately rather than totally.)
- (b) Organ dose limits based on equivalent whole body risks (Currently, dose limits are based on risk to critical organs without regard for risk to noncritical organs.)
- (c) Explicit dose limit for the public (Currently, dose limit for the public is implicit.)
- (d) Dose limit for embryo/fetus (Currently, this dose limit is not addressed.)
- (e) Regulatory cut off values (Currently, there are no diminimus dose limits below which risk is not a regulatory concern.)

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The staff asserted that implementation costs of the proposed revision to Part 20 would be small and that the following benefits would result:

- (1) Consistent regulatory basis for all licensees
- (2) Eliminates regulation of negligible releases
- (3) Better information on worker exposures
- (4) Improved understanding by worker and public of protection provided

The Committee suggested that the staff clarify precisely what the new exposure limits and their basis would be under the proposed revision to 10 CFR Part 20. Mr. Mills reported that after staff work has been completed, the proposed revision to 10 CFR Part 20 would be forwarded for CRGR review.

- 2. R. Alexander (RES) briefed the CRGR concerning a proposed new ALARA rule as an amendment to 10 CFR Part 50.

In 1978, the staff proposed some rule changes intended to strengthen efforts to maintain occupational doses of ionizing radiation as low as reasonably achievable. Additional, clarifying information on plans for staff implementation of the proposed rule changes was provided to the Commission in SECY 80-186. The staff is now submitting a revised proposed rule change based on Commission guidance in the Chilk to Dircks memorandum dated February 24, 1981. The proposed rule would require all commercial nuclear power reactor operating licensees to have occupational radiation protection programs implementing occupational ALARA.

The major revision of 10 CFR Part 20, currently under development in a parallel effort, will propose requirements for the implementation of the ALARA concept in all licensed programs. The staff indicated that the proposed amendment to 10 CFR Part 50, would not affect NMSS, research or test reactor licensees or license applicants. Research and test reactor licensees' collective doses are quite small, averaging only a few man rems per license. Therefore, the potential for significant reductions in collective dose is small and the staff believes it is reasonable to await the revision of 10 CFR Part 20 for the required implementation of the ALARA concept by these licensees. In the materials licensee area, occupational ALARA programs are presently required by license conditions for fuel cycle and medical licensees, and the ongoing rulemaking to revise 10 CFR Part 20 will codify ALARA requirements for these materials licensees. However, the staff believes that the need for a firm regulatory basis for implementation of the ALARA concept at operating power reactors should not await the revision to 10 CFR Part 20. During the last 3 years, for which data have been published; i.e., 1978, 1979, and 1980, the collective dose for all operating reactors has increased from 31,809 man rems through 39,759 man rems to 53,796 man rems. Similarly, the average collective dose per reactor has risen from 497 man rems to 791 man rems; the number of workers with measurable doses

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has increased from 45,998 to 80,331; and the collective dose per megawatt year (MWYR) has increased from 1 to 1.8 man rems per MWYR. Not yet published figures for 1981 show an increase in the total collective dose to 54,142 man rems and a slight reduction in the collective dose per reactor (773 man rems), and the collective dose per MWYR (1.7 man rems/MWYR).

It was noted that the majority of reactor licensees have improved and upgraded their radiological programs since 1980. The Health Physics Appraisal Program (HPAP) findings showed that the majority of the reactor licensees had acceptable ALARA programs, although some weaknesses were identified. There is an INPO initiative under development which is aimed at improving occupational radiation protection programs and their implementation, including the ALARA concept. As described to the staff, the INPO program would include provisions for controlling occupational dose objectives and the examination of maintenance tasks that will involve large collective doses. INPO has developed its own guidance documents, including "Performance Objectives and Criteria for Plant Evaluation." The staff plans that NUREG 0761, "Radiation Protection Plans for Nuclear Power Reactor Licensees," published for comment and now in draft regulatory guide form will be held in abeyance subject to the effective implementation of the INPO program. In this regard, the staff recommends postponing any regulatory action (rule or Reg. Guide) that would include requirements for specific dose objectives or the review of tasks that will involve large collective doses until the industry is given a chance to prove that an adequate job can be done voluntarily. The staff plans to audit the INPO program and take appropriate action to strengthen it, including revisions and additions to performance objectives and criteria. The staff plans that an evaluation will be made of the success of the INPO program following an appropriate trial period (approximately 24 months).

Based on the discussions during the briefing, the Committee made the following observations and recommendations:

- (1) There does not appear to be a clear regulatory need for the proposed rule.
- (2) The staff did not present estimates of either the benefits or costs of the proposed rule.
- (3) Since INPO has an initiative under way that is aimed at accomplishing the same goal, it is not clear what incremental benefit, if any, the proposed rule will accomplish.
- (4) In the longer term, the ongoing revision to 10 CFR Part 20 will require both occupational and nonoccupational ALARA programs for all licensees.

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- (5) In view of these observations, and the information presented at the meeting, the Committee concluded that the proposed ALARA rule change to 10 CFR Part 50 should not be published for comment.

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Victor Stello, Jr., Chairman
 Committee to Review Generic Requirements

Enclosure: List of
 Attendees

cc: Commission (5)
 Office Directors
 Regional Administrators
 CRGR Members
 G. Cunningham
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CRGR MEETING #25

LIST OF ATTENDEES

November 16, 1982

CRGR MEMBERS

V. Stello
J. Heltemes
D. Eisenhut
R. Cunningham
E. Jordan
W. Olmstead (for J. Scinto)

Others

Walt Schwink
Joanna Becker
Frank Congel
Wayne Houston
Chip Cameron
Walt Cool
Bob Baker
Bill Mills
Frank Arsenault
Tom Murley
Steve Stern
Ed Abbott
John Austin
Tom Cox
Mat Taylor
Jim Milhoan
Karl Goller
Bob Alexander
Jack Bell
Jim Partlow