



Institute of
Nuclear Power
Operations

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August 26, 1982

Mr. William J. Dircks
Executive Director of Operations
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Bill:

Now that the second appendix to the umbrella NRC/INPO Memorandum of Agreement concerning plant evaluations has been signed, I want to let you know where INPO stands on the third appendix, Coordination Plan for NRC/INPO Radiological Protection Activities.

As you are probably aware our staffs are completing work on the radiological protection coordination plan. Attached is the latest draft. I think it is in good shape and am ready to sign it in its present form.

Please let me know how you want to proceed on this one.

Respectfully,

A handwritten signature in cursive script that reads "Dennis".

E. P. Wilkinson
President

EPW/mp

Enclosure

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**APPENDIX NUMBER THREE
COORDINATION PLAN
FOR
NRC/INPO RADIOLOGICAL PROTECTION
ACTIVITIES**

1. Background

The purpose of this plan is to coordinate selected NRC and INPO utility radiological protection activities. It is also intended to provide a mechanism and a basis for NRC to take into account INPO efforts when determining the need for the development of any additional regulations or regulatory guides in this area.

There are several underlying assumptions:

- NRC and INPO recognize the existence of mutually compatible objectives reflecting concerns for the radiological protection of individuals who work at nuclear power plants.
- INPO has implemented a program of evaluation and assistance activities for its member utilities to review their radiological protection programs to achieve high standards of excellence and to minimize individual and collective occupational exposure. This is an integral part of INPO's utility evaluation program.
- The NRC's objective is that its licensee's programs ensure that worker exposures are as low as reasonably achievable (ALARA) and minimize individual and collective occupational exposure.
- INPO and NRC desire to minimize unnecessary duplication of effort.

2. Radiation Protection Program Guidance

- a. The NRC plans to issue in the near future a proposed modification to its rules which will require reactor licensees to prepare radiation protection programs. These radiation protection programs would be expected to include effective measures for assuring that worker exposures are ALARA.
- b. The NRC expects that INPO's evaluation and assistance program, with support by its member utilities, is likely to result in improved radiation protection programs that meet the intent of paragraph 2.a. above.

- c. INPO has developed written performance objectives and criteria for radiological protection and will exert its best efforts to assist utilities to meet these objectives and criteria.
- d. Documents to be used by INPO in implementing its evaluation and assistance program will be made available to the NRC and relevant information, knowledge, and experience in the area of radiation protection of workers will be shared.

INPO will upgrade its criteria and guidance documents as experience shows this to be necessary and desirable.

3. Plant Evaluations

Coordination of radiological protection program evaluations as part of INPO's plant evaluation activities will be in accordance with the Appendix Number Two "Coordination Plan for NRC/INPO Appraisal and Evaluation Activities" dated August 24, 1982.

4. NRC Recognition of INPO Radiological Protection Program

- a. The NRC intends to review the effectiveness of utility efforts to demonstrate that reasonable progress has been or is likely to be made toward the achievement of NRC's ALARA objective. An initial review of the program will be completed not later than two years from the date of this plan.
- b. The NRC will exert its best efforts to identify objective and measurable criteria that it will employ in this evaluation and will advise and consult with INPO on such criteria.

Among the criteria that NRC intends to use is the extent to which nuclear power plant licensees are successful in: (1) improving radiological protection training of workers and (2) minimizing individual and collective occupational dose, internal exposures, and the number of personnel contaminated with radioactivity.

William J. Dircks
Executive Director, Operations
U.S. Nuclear Regulatory Commission

E. P. Wilkinson
President
Institute of Nuclear Power Operations

Effective Date: