

MAY 25 1994

MEMORANDUM FOR: Charles W. Hehl, Director, DRSS, RI
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FROM: Frank J. Congel, Director
 Division of Radiation Safety
 and Safeguards
 Office of Nuclear Reactor Regulation

SUBJECT: HEALTH PHYSICS POSITION: COMPLIANCE WITH CERTAIN 10 CFR PART
 20 REQUIREMENTS FOR NRC EMPLOYEES TO BE GRANTED UNESCORTED
 ACCESS TO LICENSEE FACILITIES

The subject health physics position is enclosed for your information. This position has been revised based on consideration of comments received on a draft version that I sent to you on April 20, 1994. This position is intended to apply to all NRC licensees, and the draft that I sent to you for review had been revised in response to NMSS/IMOB comments on an earlier draft.

This document is being placed in the NRC Public Document room.

NRC (draft) Management Directive 10.131, "Standards for Protection Against Ionizing Radiation," will be reviewed to determine whether it needs to be revised to reflect the enclosed position.

Original signed by LeMoine J. Cunningham

LJC
 Frank J. Congel, Director
 Division of Radiation Safety
 and Safeguards
 Office of Nuclear Reactor Regulation

Enclosure: As stated
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HEALTH PHYSICS POSITION

Compliance with Certain 10 CFR Part 20 Requirements for NRC Employees to be Granted Unescorted Access to Licensee Facilities

QUESTION:

(a) In consideration of a licensee's need to comply with the requirements of 10 CFR 20.2104, "Determination of prior occupational dose," what information on the prior occupational dose of an NRC inspector, or other NRC employee, can a licensee expect the inspector (or other NRC employee) to provide when that individual is to have unescorted access to the licensee's facility?

(b) How is 10 CFR 20.1702, "Use of other controls," to be applied to NRC employees who are to have unescorted access to the licensee's facility?

ANSWER:

(a) 10 CFR 20.2104 applies to individuals who are likely to receive an occupational dose requiring individual monitoring. Under 10 CFR 20.1502, individual monitoring is required for (1) individuals who are likely to receive, in a year, 10% of the occupational dose limits at the licensee's facility and (2) for monitoring external doses, individuals who enter a high or very high radiation area.

Generally, no NRC employee is likely to receive an occupational dose exceeding 10% of the occupational dose limits in a year at any licensee's facility. However, some NRC employees, particularly inspectors, do enter high and very high radiation areas at licensee facilities and are required to be monitored. Furthermore, NRC expects that, for liability and other considerations, some licensees will want to provide appropriate dosimeters and monitoring to NRC inspectors and other NRC employees at their facilities; however, such activities should not impede or delay NRC inspection efforts. NRC employees are expected to follow licensee procedures to the greatest extent possible. Each NRC employee to whom a licensee will issue one or more individual monitoring devices will provide the licensee with a signed estimate of that employee's prior occupational dose for the current year so that the licensee can meet the requirements of 10 CFR 20.2104(a)(1) with respect to that individual as permitted by 10 CFR 20.2104(c)(1).

Under 10 CFR 20.2104(a)(2), a licensee is required only to attempt to obtain the records of cumulative occupational dose received before the current year. In addition, under 10 CFR 20.2104(b), cumulative occupational exposure information is required only when planned special exposures may be allowed. Licensees do not approve planned special exposures of NRC personnel, and it is unlikely that NRC will approve such exposures for NRC personnel.

Therefore, records of cumulative occupational dose received before the current year are not needed for control of exposure of NRC employees and will not be provided by NRC employees. At a licensee's request, an NRC employee will provide the licensee with a signed statement that records of that employee's cumulative occupational radiation dose prior to the current year, requested

pursuant to 10 CFR 20.2104(a)(2), will not be provided. Access to a licensee's facility must not be limited based on the lack of cumulative occupational dose history information for an NRC employee.

The NRC has its own program for radiation protection of its employees. Monitoring and control of exposures for NRC employees are established by NRC policy, which is generally consistent with the provisions of the revised 10 CFR Part 20. For external exposure, NRC personnel are monitored through a NVLAP-accredited TLD program, and are provided appropriate dosimeters for use during their NRC-related duties.

(b) For internal exposures, NRC employees are not expected to exceed the threshold, in 10 CFR 20.1502(b), for requiring individual monitoring for intake of radioactive materials. Furthermore, because of the relatively brief exposure times of NRC employees in airborne radioactivity areas, the requirements of 10 CFR 20.1702 generally can be met for NRC employees without requiring the use of respiratory protective equipment. (Many NRC employees have not been qualified to wear respiratory protective equipment.) As indicated above, NRC employees are expected to follow licensee procedures to the greatest extent possible provided that this does not result in limiting the employees' access to the facility. (Such procedures include the use of prescribed protective clothing and contamination survey requirements.) Inspectors and other NRC employees will also participate in a licensee's bioassay program, as appropriate. Positive indications of intake meeting the licensee's procedural requirements for evaluation should be evaluated in a timely manner and reported promptly to the affected individual. Reports on evaluations of intakes will be forwarded by the NRC employee to, and assessed by, the cognizant NRC Radiation Safety Officer for inclusion in NRC employee dose records.