

JUN 27 1980

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MEMORANDUM FOR: J. Kastner, MISS  
J. Nehemias, NRR  
R. Baker, SD  
W. Cool, SD  
J. Bell, SD  
T. Dorian, ELD

FROM: M. Parsont, Chief  
Radiological Health Standards Branch, SD

SUBJECT: NOTES ON JUNE 11, 1980 MEETING WITH INDUSTRY  
REPRESENTATIVES ON 10 CFR 20 REWRITE

On June 11, 1980, Joe Gallo and Stanley Wisla -- representing some 43 utilities met with NRC representatives to discuss the 10 CFR 20 rewrite. Present from NRC were Kastner, Nehemias, Baker, Cool, Bell and Parsont.

Attached for your information are copies of some notes taken during the meeting by J. Bell.

"Original signed by  
Michael A. Parsont

Michael A. Parsont, Chief  
Radiological Health Standards Branch  
Office of Standards Development

Attachment:  
As stated

Task No. RH 905-1

OFFICE ▶	RHSB:SD				
SURNAME ▶	MAParsont:sab				
DATE ▶	6/7/80				

JUNE 17, 1980

JUNE 11, 1980 MEETING  
OCCUPATIONAL ALARA  
(PART 20 REWRITE)

Jacob Kastner, (NMSS) Mike Parsont, (SD) Walt Cool, (SD) Jack Bell, (SD)  
John Nehemias, (NRR) Robert Baker, (SD) Joseph Gallo, Stanley ~~Whistler~~ WISLA

Parsont:

New AD (Purple's Replacement) will replace R. E. Cunningham as Group Leader for Part 20 rewrite.

Kastner:

Gives Gallo copy of NMSS medical ALARA blurb

Gallo:

Isham, Lincoln, Beale represents 41 utilities. Involves itself before government agencies. Is testifying before RPC today. Testifies before congress. Will participate in EPA hearing.

New buzz words 'Inspectable and Enforceable' is staff thinking of "Appendix I type thing" for occupational exposure?

Kastner:

Present thinking (draft) does not have ALARA "numbers." Has "reference levels." Emphasis is on actions to be taken as basis to exceed levels.

Stan:

Why "Graded Levels"? Why go to lower levels? Why require by rule what "we" are already doing?

Kastner:

More flexibility. Describes levels in Part 20 rewrite draft, including "special exposures."

Baker:

Why effect "current practice"? Because not all licensees are "good guys." "Bank" concept to be done away with.

Gallo:

How important is "unenforceability of ALARA"?

Stan:

Feels we are saying that 0.001 mrem is as important as 5 rem

Cool:

78-415 proposals vs. Part 20 rewrite--two different things. Some people think 5 rem/yr too high. Some licensees don't need 5 rem/yr to work against. Want to avoid unnecessary exposures. Not trying to squeeze reactors.

Parsont:

Refers to "order" issued to "medical" licensees. Parsont not aware of latest status.

Stan:  
Asks if WSC feels "we" aren't avoiding unnecessary exposure.

Cool:  
Not all licensees in any category are avoiding all unnecessary exposures.

Gallo:  
Looks at medical ALARA blurb. Levels are flexible - can be changed by licensee.

Stan:  
(In response to question about ALARA implementation at Indian Pt I)  
We review every exposure ("I review them").

Gallo:  
How determine if exposures are too high?

Stan:  
We know the job.

Still feels we are at least implying greater risk per rem than in past.

Gallo & Stan:  
The linear hypothesis is not correct. NCRP, etc.--effect really less than linear.

Kastner:  
We are "under orders" from EPA to assume linear relationship.  
Discusses linear vs. non-linear.

Gallo:  
Although you must assume linear hypothesis as basis for rule--can use reduced effect per rem ~~curve~~ as basis for ALARA  
Refers to "deminimus" levels.

Kastner:  
Medical investigational levels are not "deminimus."  
Tentatively, 25 mrem is deminimus.

Gallo:  
Investigation level is ALARA "remedy."

Kastner:  
No! Just a "trigger point."  
0.1 MPD for NMSS medical ALARA program is based on personnel dose data.  
95% of licensees' employees received less than 0.5 rem/yr.

Note: The NMSS medical ALARA program is separate from Part 20 rewrite.

Baker:  
Makes point that staff is not set on way to implement ALARA. Describes qualitative and quantitative approaches.

Gallo:

Collective dose control?

Kastner:

No collective dose proposal in NMSS medical ALARA program.

Part 20 would not have collective dose number for all licensees.  
Parts 30, 40, 50, etc.  
would treat individual types of licensees.

Baker:

English ahead of us in quantification for risk-benefit determination.

Gallo:

Commission backed-off \$/manrem.

Kastner:

But it is "on the table" and giving us fits. People want to use it for the wrong purposes.

Expresses opinion that regulations should include emission limit(s) in addition to the present concentration limits.

Bell:

(In response to Gallo). Describes ALARA rule change proposed to Commission.

Stan:

Again asks if we feel reactor licensees aren't effectively practicing ALARA.

Kastner:

Says medical ALARA "order" is "answer" to those who feel MPD should be lowered by 10.

Gallo:

But this mechanism really establishes new limit.

Bell:

(In response to Gallo) Describes relationship between rules (20, 30, 40, 50, 70) and regulatory guides including ALARA program guidance and practice guidance.

Kastner:

Medical blurb has not been sent to licensees. (Gives copy to Gallo).

Explains that "limits" will be set by EPA--not us.

Says RPC may not deliver all that one might hope for.

Gallo:

Will submit comments on Part 20 rewrite, including attachments by Marvin Goldman and Hoyt Whipple re low risks at low doses.

Kastner:

Remember--NRC deals w/things other than reactors.

Kastner: (continued)

Any "deminimus" level should be proposed as deminimus from regulatory standpoint--not risk standpoint. (Suggests that  $10^{-8}$  risk to world population might be deminimus).

Parsont:

(In response to Gallo) Re hearing. RPC was asked to make a recommendation regarding a hearing. If we don't hear by September there will be great pressure to hold hearing with OSHA or unilaterally.