

AUG 18 1989

Docket No. 50-354

Public Service Electric & Gas Company
ATTN: Mr. Steven E. Miltenberger
Vice President and
Chief Nuclear Officer
Post Office Box 236
Hancocks Bridge, New Jersey 08038

Gentlemen:

SUBJECT: DEFINITION OF "EXTREMITY" FOR PURPOSES OF SETTING OCCUPATIONAL
EXPOSURE LIMITS

The purpose of this memorandum is to clarify the NRC's position regarding the definition of "extremity" for purposes of setting occupational exposure limits. NRC inspections have shown that a number of licensees are using a definition of "extremity" that is contrary to the provisions of 10 CFR Part 20.101, "Radiation Dose Standards for Individuals in Restricted Areas". This regulation specifies that "extremity" dose limits apply to the "hands and forearms; feet and ankles." Information provided in NRC Information Notice No. 81-26, Part 3, Supplement No. 1, has been misunderstood, and was not intended to change what is considered to be an extremity. This Information Notice discusses placement of personnel dosimeters for determining whole body doses.

Because of this apparent misunderstanding, we plan no enforcement action if your procedures have incorporated this misunderstanding. We have issued the enclosed memorandum to provide clarification on the intent of Information Notice No. 81-26, and what is considered to be an extremity. We request that you ensure your procedures incorporate the applicable dose limits of 10 CFR Part 20.

Your cooperation with us in this matter is appreciated. Please contact me if you have any concerns or questions regarding this matter.

Sincerely,

Original Signed By:
Ronald R. Bellamy

Ronald R. Bellamy, Chief
Facilities Radiological Safety and
Safeguards Branch
Division of Radiation Safety and
Safeguards

Enclosure:

Memorandum from LeMoine J. Cunningham to
Ronald R. Bellamy, et. al., dated June 22, 1989

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AUG 18 1989

cc w/encl:

S. LaBruna, Vice President-Nuclear
Scott B. Ungerer, Manager, Joint Generation Projects Department,
Atlantic Electric Company
J. J. Hagen, General Manager - Hope Creek Operations
L. A. Preston, General Manager - Licensing and Regulation
R. Fryling, Jr., Esquire
Licensing Project Manager, NRR
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bcc w/encl:

Region I Docket Room (with concurrences)
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DRP Section Chief
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RI:DRSS
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Sherbini
7/20/89

RI:DRSS
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8/1/89

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Bellamy
8/7/89

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

ENCLOSURE

JUN 22 1989

MEMORANDUM FOR: Ronald R. Bellamy, Chief, EPRPB, DRSS, Region I
Douglas M. Collins, Chief, EPRPB, DRSS, Region II
L. Robert Greger, Chief, RPB, DRSS, Region III
Blaine Murray, Chief, RPSB, DRSS, Region IV
Gregory P. Yuhas, Chief, EPRPB, DRSS, Region V

FROM: LeMoine J. Cunningham, Chief
Radiation Protection Branch
Division of Radiation Protection
and Emergency Preparedness
Office of Nuclear Reactor Regulation

SUBJECT: CORRECTION OF MISUNDERSTANDING CONCERNING
OCCUPATIONAL DOSE LIMITS FOR "EXTREMITIES"

The purpose of this memorandum is twofold: (1) to document the correction of a misunderstanding concerning occupational dose limits for "extremities," and (2) to provide guidance concerning potential enforcement action in cases in which licensees have incorporated this misunderstanding into their procedures.

10 CFR Part 20 provides different occupational dose limits for (1) the "whole body; head and trunk; active blood-forming organs; lens of eyes; or gonads;" (2) the "hands and forearms; feet and ankles"; and (3) the "skin of the whole body." As indicated in the instructions for NRC Form 5, "Current Occupational External Radiation Exposure," the dose to the "hands and forearms; feet and ankles" includes the dose to the skin of these body parts. The dose to the skin is assessed at a depth of 7 mg/cm² in tissue. Thus, the limit for the "skin of the whole body" and the limit for the "whole body..." apply to all parts of the body except the "hands and forearms, feet and ankles."

The term "extremities" has often been used to designate the "hands and forearms; feet and ankles," although this term is not used in 10 CFR Part 20. The term "extremities" is used in the pending major revision of 10 CFR Part 20 where it has the different meaning of "hand, elbow, arm below the elbow, foot, knee, and leg below the knee." However, this revised definition should not be used until the effective date of the major revision.

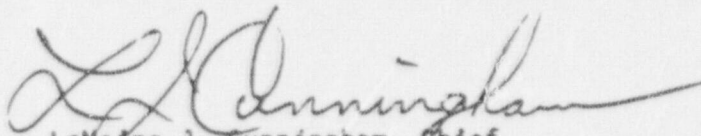
CONTACT:
John D. Buchanan, NRR
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890 747 03 75 392

JUN 22 1989

the licensee corrects the procedure(s). Enforcement action should be considered for any licensee who, after being given a copy of this memorandum, refuses to correct a procedure that incorporates the misunderstanding of the dose limits of 10 CFR Part 20; however, please contact me before you initiate any such action.

This memorandum has been coordinated with the Office of Enforcement.

A handwritten signature in cursive script, appearing to read "L. Cunningham", written in dark ink.

LeMoine J. Cunningham, Chief
Radiation Protection Branch
Division of Radiation Protection
and Emergency Preparedness
Office of Nuclear Reactor Regulation

JUN 22 1989

IE Information Notice No. 81-26, Part 3, Supplement No. 1, "Clarification of Placement of Personnel Monitoring Devices for External Radiation," was issued July 19, 1982. That information notice discusses placement of personnel dosimeters for determining whole body doses in situations where the principal source of radiation is from underfoot. That information notice indicates, and our position continues to be, that, in these situations, "a reasonable placement for a whole body dosimeter would be just above the knee." That information notice also notes that "extremity monitoring requirements may dictate the placement of additional dosimeters in the feet and ankle area."

Information notices cannot impose or change regulatory requirements and Information Notice No. 81-26, Part 3, Supplement 1 did not change the requirements of 10 CFR Section 20.101. Nevertheless, some licensees and, in at least one instance, regional personnel have maintained, incorrectly, that Information Notice No. 81-26, Part 3, Supplement 1 defined or redefined the terms "extremity", or "extremities" to include the knee and the lower leg between the knee and the ankle and thereby extended the applicability of the 18.75 rem dose limit for the "extremities" to the lower leg above the ankle and to the knee. Some licensees have changed their radiation protection procedures to incorporate this misunderstanding and thereby to misrepresent the dose limits of 10 CFR Part 20.

This misunderstanding of the requirements of 10 CFR Part 20 has been identified primarily in relation to potential violations of the occupational dose limits resulting from radiation exposures from hot particles on or near the skin. One example of this misunderstanding is the result of an informal survey taken by one licensee and reported to the NRC. In that survey, ten nuclear power stations were contacted and asked, "If one of your personnel had been exposed to a hot particle in the region of the body between the middle of the knee and ankle, would you identify the dose as being to the skin of the whole body or to the extremity?" Four stations responded, correctly, that they would record the dose as the skin of the whole body. The other six stations said they would record the dose as being to the "skin of the extremity", thus indicating their misunderstandings of both 10 CFR Part 20 and Information Notice No. 81-26, Part 3, Supplement No. 1.

In summary, for exposures of the knee and the lower leg above the ankle, the applicable occupational radiation dose limits of 10 CFR Section 20.101 are:

- (1) the whole body dose limit of 1.25 rem per quarter or 3 rem per quarter, and
- (2) the skin of the whole body limit of 7.5 rem per quarter.

This memorandum is being placed in the NRC Public Document Room and I encourage you to make it available to licensees.

Licensees who have incorporated the misunderstanding concerning "extremity" doses into their procedures should be asked to correct those procedures; however, no enforcement action should be taken for such incorrect procedures if

INDEX
OPERATING REACTORS

Licensee

BWR

		<u>Pg. No.</u>	<u>Sys. Pg. No.</u>
Boston Edison Company	DN 50-293 Pilgrim 1	6	12 - 13
GPU Nuclear Corporation	DN 50-219 Oyster Creek 1	4	9
Philadelphia Electric Company	DNs 50-277/50-278 Peach Bottom 2/3	5	10 - 11
Power Authority of the State of New York	DN 50-333 James A. FitzPatrick	1	3 - 4
Niagara Mohawk Power Corporation	DNs 50-220/50-410 Nine Mile Point 1/2	3	7 - 8
Northeast Nuclear Energy Company	DN 50-245 Millstone 1	2	5 - 6
Vermont Yankee Nuclear Power Corporation	DN 50-271 Vermont Yankee	7	14 - 15
Pennsylvania Power & Light Company	DN 50-387/50-388 Susquehanna 1/2	20	38 - 39
Philadelphia Electric Company	DN 50-352/50-353 <u>Limerick 1/2</u>	21	40

INDEX
OPERATING REACTORS

Licensee

PWR

		<u>Pg. No.</u>	<u>Sys. Pg. No.</u>
Baltimore Gas and Electric Company	DNs 50-317/50-318 Calvert Cliffs 1/2	9	18 - 19
Connecticut Yankee Atomic Power Co.	DN 50-213 Haddam Neck	10	20 - 21
Consolidated Edison Co. of New York Inc.	DN 50-247 Indian Point 2	12	23 - 24
Power Authority of the State of New York	DN 50-286 Indian Point 3	13	25 - 26
Duquesne Light Company	DNs 50-334/50-412 Beaver Valley 1/2	8	16 - 17
Maine Yankee Atomic Power Company	DN 50-309 Maine Yankee	14	27 - 28
General Public Utilities Nuclear Corporation	DN 50-289 TMI 1	17	33 - 34
General Public Utilities Nuclear Corporation	DN 50-320 TMI 2	18	35 - 36
Northeast Nuclear Energy Company	DN 50-336 Millstone 2	15	29 - 30
Northeast Nuclear Energy Company	DN 50-423 Millstone 3	25	53
Public Service Electric and Gas Company	DN 50-272/50-311 Salem 1/2	16	31 - 32
Rochester Gas & Electric Corporation	DN 50-244 Ginna	11	22
Yankee Atomic Electric Company	DN 50-29 Yankee Atomic	19	37
Long Island Lighting Co.	DN 50-322 Shoreham	22	41 - 44
Public Service of New Hampshire	DN 50-443 Seabrook 1	23	45 - 50

INDEX

CONSTRUCTION

<u>Facility</u>	<u>Docket #(s)</u>	<u>Page</u>	<u>Sys. Pg. No.</u>
<u>BWR</u>			
Hope Creek 2	50-354	1	2 - 3