

Chairman Resource

From: Kevin Dale <kevin.crymes@gmail.com>
Sent: Monday, July 13, 2026 10:40 AM
To: Chairman Resource
Subject: [External_Sender] Personal Observation Regarding Implementation of the Proposed Radiation Protection Framework (NRC-2025-1140)

Chairman Nieh,

I am writing in my personal capacity as a radiation protection professional. These comments reflect my own observations and do not represent the views of my employer.

I appreciate the NRC's efforts to improve regulatory clarity and reduce ambiguity associated with radiation protection requirements. I also appreciate your recent statements that existing facilities with mature ALARA programs should not expect major changes as a result of the proposed rule and that the objective is to improve clarity rather than reduce safety. The proposed framework appears intended to provide a more predictable and objective structure for radiation protection while maintaining established dose limits and safety standards.

My primary concern is not the removal of the term ALARA itself, but ensuring that the replacement graded dose management framework is implemented consistently by licensees, Agreement States, inspectors, and management organizations.

Many operating nuclear stations already employ highly developed occupational dose management programs that are implemented through existing ALARA processes. These programs typically include dose-based planning thresholds, escalating review and approval levels, shielding evaluations, work-in-progress reviews, post-job reviews, management oversight, pre-job briefings, and other optimization activities. In practice, these programs already function as graded dose management systems, even though they are currently described as ALARA programs. These processes have evolved over decades of operating experience and provide a structured framework for planning, reviewing, and optimizing radiological work commensurate with anticipated dose and risk.

The proposed rule specifically asks stakeholders to identify unintended consequences and how they should be addressed. In my view, one potential unintended consequence is uncertainty regarding expectations for occupational dose planning and optimization. My concern is not that the NRC intends to reduce radiological protection. Rather, some organizations could interpret the removal of familiar ALARA terminology as a reduction in expectations for occupational dose planning and optimization rather than a modernization of the regulatory framework, despite the NRC's stated position that facilities with mature ALARA programs should not expect significant programmatic changes.

Because many existing radiation protection programs already incorporate graded controls, planning thresholds, oversight, and optimization activities consistent with the proposed framework, I believe the final rule or accompanying guidance should explicitly recognize existing ALARA programs as acceptable methods of compliance with the graded dose management requirements. Such clarification would help promote consistent implementation across licensees, Agreement States, and inspection programs while reinforcing the NRC's objective of improving clarity and predictability without reducing safety.

Additional guidance describing how occupational dose management decisions are expected to be planned, documented, and inspected under the new framework would significantly reduce uncertainty for licensees, inspectors, and Agreement States. In my view, this would further support the NRC's goal of creating a more objective and predictable regulatory framework while avoiding unintended differences in implementation.

Thank you for your consideration and for the NRC's continued engagement with stakeholders throughout this rulemaking process.

Respectfully,
Kevin Crymes

Submitted in a personal capacity and not on behalf of any employer or organization.