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July 1, 2005

MEMORANDUM TO: Sher Bahadur, Chairman  
Committee to Review Generic Requirements

FROM: R. William Borchardt, Deputy Director  
Office of Nuclear Reactor Regulation

SUBJECT: PROPOSED RULEMAKING TO AMEND 10 CFR PARTS 19 AND 20:  
COLLECTION, REPORTING, AND LABELING REQUIREMENTS, AND  
CLARIFICATION OF DOSE DETERMINATION METHODOLOGY

The Office of Nuclear Reactor Regulation (NRR) is requesting that the Committee to Review Generic Requirements (CRGR) waive its review of the attached proposed rulemaking package for 10 CFR Parts 19 and 20. This proposed rulemaking 1) amends the provisions of 10 CFR 19.13 to require licensees to provide annual occupational dose reports only to workers if they meet certain criteria; 2) revises 10 CFR 20.1905 to add an exemption from the requirements in 10 CFR 20.1904, for the labeling of certain containers within posted areas in nuclear power reactor facilities; 3) removes the requirement in 10 CFR 20.2104 that requires licensees to attempt to obtain the records of cumulative occupational radiation doses for all employees, except in the case of a planned special exposure; and 4) changes the definition of total effective dose equivalent (TEDE) in 10 CFR 20.1003 to be more consistent with the technical basis for the requirements in Part 20 by clarifying that TEDE is the sum of the effective dose equivalent (for external exposures) and the committed effective dose equivalent (for internal exposures). As a result, administrative and paperwork requirements would be reduced without adverse impact on occupational or public exposure limits. The effect of this action would allow NRC licensees to change selected procedures to reduce the administrative burdens associated with the current regulations. The subject proposed rule does not have any safety implications.

In support of our request to waive CRGR review, we note that the nature of the proposed changes to Parts 19 and 20 allows light-water reactor licensees to continue current practices if they determine it is not cost beneficial to make the administrative changes needed to adopt the relaxed requirements, and that does not involve a backfit.

If CRGR decides that a review of the proposed rulemaking package is warranted, we will be glad to brief the Committee. A special meeting of the CRGR will be required in order to accommodate the rulemaking schedule. This task is scheduled to be transmitted to the Office of the Executive Director no later than September 23, 2005, in order to support the overall schedule of providing the proposed rulemaking package to the Commission by XXXX XX, 2005. If CRGR elects to review the package, then we suggest a meeting on July XX, 2005. To support a July XX, 2005, meeting, and recognizing the need for providing CRGR members with a reasonable period for review, we are transmitting the rulemaking package to CRGR prior to NRR Office concurrence. All the divisions within NRR have concurred, and all offices have concurred with the exception of the Office of General Counsel (OGC) (OGC provided a no legal objection for CRGR review due to no backfit issues involved).

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Attachment: Rulemaking Package

cc: L. Cupidon

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