Labeling of Containers

This provision exempts licensees from labeling containers holding licensed materials within an area posted under 10 CFR 20.1902. However, § 20.1904 requires the containers to be labeled before removing them from the posted area removing the generic label placed on the container indicating its radiation hazard.

- Aren't we requiring licensees to label containers twice (i.e., conspicuously mark containers commensurate w/the rad hazard then label IAW the regulations if moved from the posted area)?

Yes, but the revision still provides licensees with considerable relief because many items that come under the label "container" in the RCA, and that therefore come under the labeling requirements, rarely leave the confines of the RCA, and such containers will therefore not be labeled twice. It is normal licensee policy to minimize the number of items that cross the boundary between the RCA, which is assumed to be a contamination area, and the outside because of the considerable amount of work that is required to survey the items and decontaminate them if necessary. Licensee practice, therefore, is to minimize such crossings, and will by the same token minimize the need for labeling twice.

- If this provision truly eases administrative requirements why not extend this to all licensees?

This was considered but not extended for two major regions. The first is that few licensees other than power reactors have the large numbers of containers that would require labeling, and would therefore benefit from such relief. In addition, few licensees have the same degree of control over activities in the RCA, and the level of training and health physics surveillance, that is found at the reactor sites. Therefore, granting such an exemption to all licensees would create many more uncertainties and difficulties than is warranted by the small relief it may provide in such cases

- The process for conspicuously marking containers in a posted area appears to be left to the licensees to decide how to implement. Could leaving this up to licensees cause confusion and lead to challenges during NRC inspections?

This should not cause difficulties because it is normal practice for the NRC to leave the methods and details of implementing its requirements to the licensee, provided the licensee is able to justify the method they are using and to show that it is adequate to satisfy NRC requirements. NRC inspectors are familiar with this approach and find no difficulty in inspecting the licensee's methods of implementation. In addition, the industry itself will tend to standardize the methods they decide to use for marking containers across reactor sites because this saves effort training workers on site-specific work rules, especially in the case of workers who do outage work and therefore constantly move from one site to the next.

Response to Comments - Cumulative Occupational Dose

Comment on NRC potentially implementing the ICRP recommendations averaging worker dose over several years requiring licensees to reconstruct a worker's prior dose records.

- I'm not sure the response addresses or resolves the comment. Is there a better way to address whether the final amendments would negatively impact licensees

if the Commission were to adopt specific ICRP recommendations, in particular, the averaging of worker dose over several years.

The proposed change in this area would not affect the ability of licensees to implement dose averaging if the Commission decides to adopt this practice. The reason is that the revision does not remove the requirement to record and report the doses received by monitored workers. Such dose records are required to be documented on NRC FORM 5s for each worker for each calendar year. The FORM 5 records from past years are available for any purpose, are in fact used to monitor trends etc. What the rule does is to remove the requirement for each licensee to compile the exposure history of each worker as recorded on previous FORM 5s, even though the compiled record is not used for any purpose other than in the case of planned special exposures, and there has not yet been any cases of planned special exposures in the industry. This requirement to compile a dose history for each worker therefore represents an unwarranted expenditure of considerable resources for no useful purpose. Should a purpose develop (such as dose averaging) that would justify such data compilation, then it would be easy to do so because the records are available.