

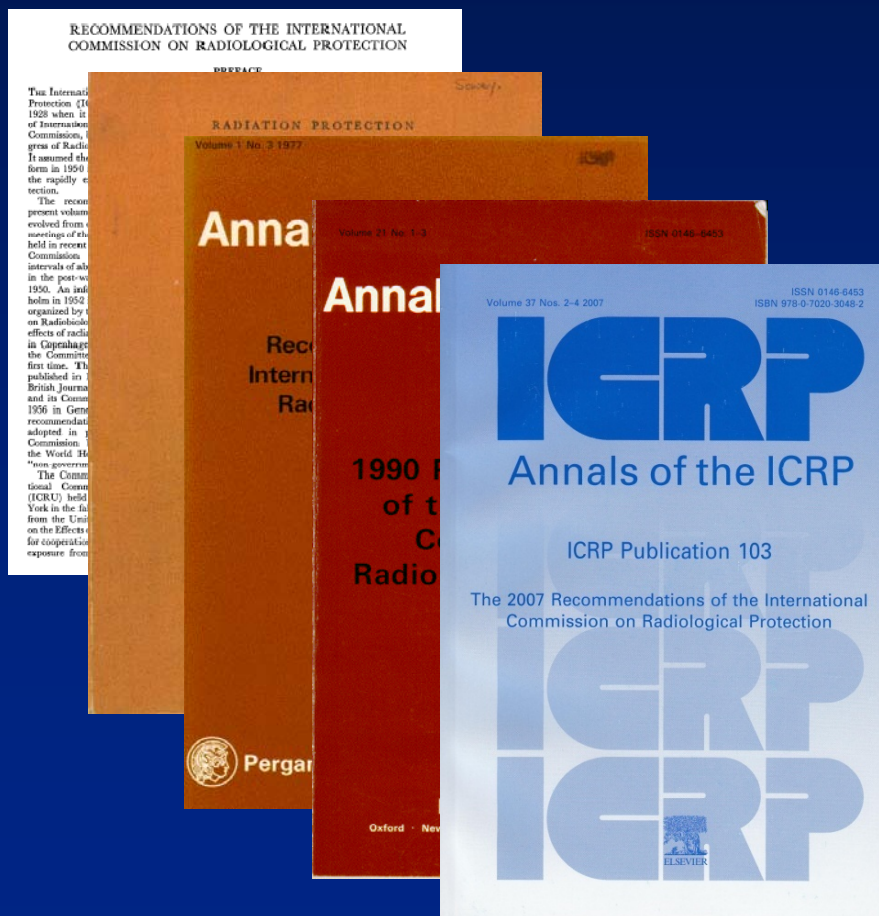
Options to Revise Radiation Protection Regulations

*2011 ISOE North American ALARA Symposium
EPRI Radiation Protection Conference
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History

- International Commission on Radiological Protection (ICRP) Recommendations
 - Earlier recommendations: 1928, 1934, 1937, 1950, 1954
 - 1959 Publication 2
 - 1977 Publication 26
 - 1990 Publication 60
 - 2007 Publication 103



Background

- ICRP revised recommendations in late 2007
- NRC staff analysis indicated areas warranting consideration for revisions
- Commission approved staff recommendation to engage stakeholders and initiate development of technical basis materials on April 2, 2009



Outreach Activities

- Phase I of outreach included:
 - Presentations to numerous organizations and groups
 - FRN published inviting inputs (72 FR 32198)
 - Dedicated web address for comments Regs4RP@nrc.gov
- Phase II Workshops
 - FRN published with issues and questions (75 FR 59160)
 - Workshops in Washington, Los Angeles, and Houston
 - Comments accepted through January 31, 2011



Issues

- **Effective Dose and Numerical Values**
- **Occupational Dose Limits**
- **Dose Limits for Special Populations**
- **ALARA planning**



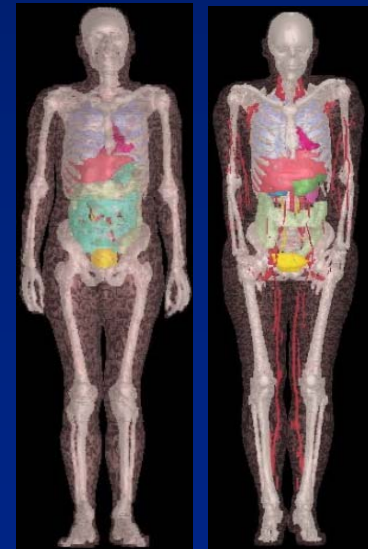
What Did We Hear?

- Participants from the wide diversity of NRC licensed activities
- Active participation
- Common themes in each workshop



TED and Numerical Values

- **General support for updating numerical values and scientific base**
- **Mixed views on terminology**
- **Many suggested delaying rulemaking until ICRP completes work on dose coefficients**
- **Some discussion of moving from Regulation to Guidance**



Occupational Dose Limits

- ICRP Recommendation is 10 rem over 5 years, with a maximum of 5 rem in any one year
- Part 20 limit is 5 rem per year
- Little support for change to regulation
 - Certain groups of licensees continue to have individuals above 20 mSv/yr (2 rem)
 - Standard of Care needs to remain as is
 - ALARA has resulted in achieving desired dose reductions
 - Many do not believe changes in risk justify change to limit



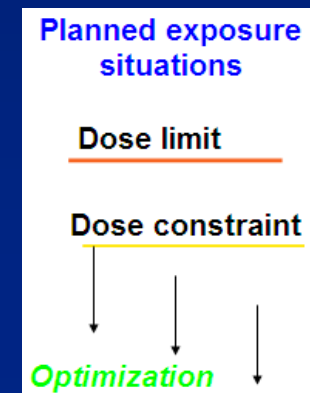
Special Populations

- **Dose Limits for Embryo/Fetus (Occupational)**
 - Mixed feedback
 - Current limit does not seem to pose issues for many licensees
 - Options don't seem to change level of protection
 - Change could challenge detection capabilities
- **Public Exposure**
 - Alternative dose provisions have not been used
 - Patient Release needs to remain unchanged



ALARA Planning

- Most licensees do planning to reduce exposures and use a variety of criteria to trigger actions
- Little support for using the term “constraint”
- Many concerned that any numerical values in regulations will be a *de facto* limit
- Some support for explicitly requiring planning, but with reservations of what inspectors would be expecting in licensing programs



Future Plans

- **Phase III – Validation of information received, Spring 2011**
- **Staff recommendations to Commission – Fall 2011**
- **Development of Technical Basis to support Commission decisions**



What Is the Staff Going to Recommend?

- “Too soon to tell”
- You still have the opportunity to give us:
 - Positions
 - Rationale
 - Arguments



Let Us Know

- Web pages

<http://www.nrc.gov/about-nrc/regulatory/rulemaking/opt-revise.html>

- Email Address: regs4rp@nrc.gov

