RP Program Highlights for 2011

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Presentation Overview

- RP 2020 Overview
- Inform and Influence RP Regulations
 - New Plant Construction and Preoperational RP Issues
 - Industry Comments on Draft Regulatory
 Guides
 - Carbon-14
 - Groundwater
- NEI Potential Changes to RP Regulations

RP 2020 Goal

Reshape radiation protection at nuclear power plants to achieve significant improvements in safety performance and cost-effectiveness



Partners in Creating RP 2020

Radiation Protection Managers

Chief Nuclear Officers



NEI = Policy

INPO = Performance

EPRI = Research



Objectives

- **1.** Reduce radiation fields (EPRI)
- 2. Improve technologies utilization (EPRI)
- 3. Align RP workforce supply & demand (NEI)
- 4. Inform and influence RP regulations (NEI)
- 5. Standardize RP practices (NEI/INPO)
- 6. Improve RP transparency and openness (NEI)



Inform and influence RP regulations



New Plant RP Issues

- ✓ Completed 5 generic FSAR Templates
- Ongoing Coordination of 4 Construction and Pre-operational RP Issues:
 - Exposure of Workers
 - Use of Sources Of Radiation Not Licensed Under the COL
 - Excavation of Soil & Sediments and Pumping of Surface and Groundwater
 - Final Site Configuration Post Construction



Comments on Draft Regulatory Guides

Draft Regulatory Guide Number	Current Regulatory Guide Number and Revision	Title	Status
DG-8039	8.40, Revision 0 (New)	Methods for Estimating Effective Dose Equivalent from External sources	Comments submitted on November 19, 2009; Published in July 2010
DG-1199	1.183, Revision 0 (2000)	Alternative Radiological Source Terms for Evaluating Design Basis Accidents at Nuclear Power Reactors	Comments submitted in February, 2010
DG-8032	8.35, Revision 0 (1992)	Planned Special Exposures	Comments submitted on March 5, 2010
DG number not assigned	8.7, Revision 2 (2005)	Instruction for Recording and Reporting Radiation Dose Data	Advanced comments were provided on March 5, 2010.
Withdrawal	8.6 , Revision 0 (1973)	Standard Test Procedure for Geiger- Muller Counters	Concurrence letter for withdrawal was submitted on March 25, 2010. Document is withdrawn.
DG-8036	8.4, Revision 0 (1973)	Personnel Monitoring Device – Direct- Reading Pocket Dosimeters	Comments submitted on June 4, 2010
DG-8035	8.2, Revision 1 (1973)	Administrative Practices in Radiation Surveys and Monitoring	Comments submitted on Oct. 18, 2010



- Submitted comments to NRC on March 31, 2010 with 4 major messages:
 - 1. Current regulatory framework provides adequate protection





2. Do not just revise regulations, reform them

- establish a uniform technical basis for all NRC radiation protection regulations and guidance documents
- place all primary dose standards, definitions and generically applicable requirements into Part 20.
- place derived secondary values, guidelines and constraints in guidance rather than in regulations.
- utilize consolidated guidance to the extent practical one consolidated guide for each part.



3. One science, one standard, one agency

 promote uniformity across Federal and state radiation protection regulations

4. Phased-in implementation

 to allow for appropriate budget and resource allocation for completing programmatic changes.







- ✓ Participated in NRC facilitated meetings
 - **❖ NEI Health Physics Forum July, 2010**
 - October, 2010 in Silver Spring, MD
 - November 2010 in Los Angeles, CA and Houston, TX
- Participating in EPRI Assessment of Potential Worker Dose Impact
- Will provide additional written comments to NRC by January 31, 2011





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