



RON CHAPMAN, MD, MPH
Director

State of California—Health and Human Services Agency
California Department of Public Health



EDMUND G. BROWN JR.
Governor

INFORMATION NOTICE

September 26, 2014

Subject: Possible future changes to national public and occupational radiation protection standards

The U.S. Nuclear Regulatory Commission (NRC) is considering revising some aspects of title 10, Code of Federal Regulations, Part 20 (10 CFR 20), including public and occupational radiation exposure limits. The California Department of Public Health (CDPH) has incorporated 10 CFR 20 into title 17, California Code of Regulations, section 30253, and applies those provisions to all RAM and X-ray machine users subject to CDPH jurisdiction. Therefore, any changes by NRC may impact California's radiation users.

The NRC has published an Advance Notice of Proposed Rulemaking (ANPR) to obtain input from stakeholders on the development of a draft regulatory basis to support potential changes to 10 CFR 20 to achieve greater alignment between the NRC's radiation protection regulations and the 2007 recommendations of the International Commission on Radiation Protection (ICRP) contained in ICRP Publication 103. NRC currently proposes some differences from the ICRP recommendations, as noted in the NRC's ANPR and summarized below (both ICRP and NRC positions are noted where differences exist).

Specific items being evaluated include the following. (This is not an exhaustive list.)

- Occupational Dose Limit for the Lens of the Eye
 - ICRP:** Reduce the dose to the lens of the eye from 15 rem per year to 2 rem per year, averaged over 5 consecutive years, with no single year exceeding 5 rem.
 - NRC:** Reduce the dose to the lens of the eye from 15 rem per year to 5 rem per year.
- Dose Limit for Embryo/Fetus of a Declared Pregnant Occupational Worker
 - Reduce the dose to an embryo/fetus of a declared pregnant worker from 500 mrem for the entire gestation period to 100 mrem for the entire gestation period.
- Occupational Dose/ALARA Planning
 - ICRP:** Reduce the dose to occupational workers from 5 rem per year to a 5-year average of 2 rem per year, with the dose in any given year not to exceed 5 rem.

- NRC**: Retain the 5 rem per year occupational worker dose limit, but control worker doses under ALARA to achieve the ICRP recommended worker annual dose whenever reasonably achievable.
- Metrication - Units of Radiation Exposure and Dose
 - ICRP**: Use the International System (SI) of Units (e.g. Sievert/Gray/Becquerel) as the regulatory standard for expressing radiation exposure and radioactivity.
 - **NRC**: Use SI units as the regulatory standard, but also show traditional units.
- Methodology and Terminology
 - Terminology changes concerning dose terms; updating weighting and quality factors; revising Appendix B values; introducing age and gender weighted dose coefficients for environmental intakes
- Reporting of Occupational Exposure (Not related to ICRP Recommendations)
 - Expansion of 10 CFR 20.2206 radiation monitoring reporting to include Agreement State licensees and additional licensee categories

IMPORTANT:

- Written comments need to be submitted to NRC by November 24, 2014, as directed in NRC's ANPR. **Do not submit comments to CDPH.**
- NRC's ANPR can be found on the Federal Register at the following link.
 - <http://www.gpo.gov/fdsys/pkg/FR-2014-07-25/pdf/2014-17252.pdf>.
- There are specific questions contained within the NRC ANPR to which NRC is seeking stakeholder input. Comments concerning other issues pertaining to the ANPR will also be considered by NRC staff.
- NRC started conducting weekly public meetings/webinars concerning the ANPR on September 24, 2014. The September 24 meeting was an overview of the ANPR, with weekly meetings/webinars to continue on Thursdays throughout October to address in more detail the specific issues addressed in the ANPR. NRC announcement of the public meetings/webinars is attached. CDPH recommends that licensees and registrants take advantage of this opportunity to learn NRC's current thinking concerning the potential changes to 10 CFR 20, and to ask questions and provide comments to NRC as appropriate.

NRC PUBLIC MEETING NOTICE--- SERIES OF PUBLIC MEETINGS/WEBINARS ON ADVANCE NOTICE OF PROPOSED RULEMAKING (ANPR)-POTENTIAL CHANGES TO THE NRC'S RADIATION PROTECTION REGULATIONS

PURPOSE: To inform interested parties of the series of public meetings/webinars to provide an opportunity for the NRC staff to provide clarifying information relative to the Part 20 ANPR and to provide an opportunity for NRC staff to obtain clarifying information from concerned individuals on issues relative to any potential changes to NRC's radiation protection regulations.

BACKGROUND: On July 25, 2014, the NRC published in the Federal Register an ANPR for potential changes to 10 CFR Part 20 (79 FR 43284). The notice is available at: <http://www.gpo.gov/fdsys/pkg/FR-2014-07-25/pdf/2014-17252.pdf>. The NRC issued the ANPR to obtain input on the development of a draft regulatory basis. The draft regulatory basis would support potential changes to the NRC's current radiation protection regulations in 10 CFR Part 20. The goal of this effort is to achieve greater alignment between the NRC's radiation protection regulations and the 2007 recommendations of the International Commission on Radiological Protection (ICRP) contained in ICRP Publication 103. The ANPR identifies specific questions and issues that will be considered by the NRC staff in developing the draft regulatory basis.

DISCUSSION: The NRC staff has planned six Category 3 public meetings/webinars on the ANPR. All of the meetings will be facilitated and transcribed to enhance participation and the gathering of feedback from the public, stakeholders and regulatory partners.

DATES, TIMES AND PARTICIPATION INFORMATION:

- ❖ **Kickoff meeting/webinar** - September 24, 2014- Commission Briefing Room-OWFN - 1 to 5 pm
 - Facilitated discussion of background, issues, and future activities.
 - Webinar Participation for Kickoff Meeting: Prior to the start of the webinar, please dial: 1-888-913-9205 and provide the operator with passcode: 34556. Please call 5-10 minutes prior to the start of the public meeting/ webinar to allow sufficient time to speak to the operator and be connected. The webinar access information is available at: <https://www1.gotomeeting.com/register/932012425>.

- ❖ **Second meeting/webinar** - October 2 –TWFN-ACRS room-T2B3--1 to 5 pm
 - Facilitated discussion of Issue 1- Update 10 CFR part 20 to align with ICRP Publication 103 methodology and terminology and associated questions.
 - Facilitated discussion of Issue 2 - Occupational Dose Limit for the Lens of the Eye and associated questions.
 - Webinar Participation for Second Meeting: Prior to the start of the webinar, please dial: 1-888-913-9205 and provide the operator with passcode: 95372. Please call 5-10 minutes prior to the start of the public meeting/ webinar to allow sufficient time to speak to the operator and be connected. The webinar

access information is available at:
<https://www1.gotomeeting.com/register/419351848>.

- ❖ **Third meeting/webinar** – October 9 -OWFN-O16B04---1pm to 5pm
 - Facilitated discussion of Issue 3- Dose Limit for Embryo/Fetus of a Declared Pregnant Occupational Worker and associated questions
 - Facilitated discussion of Issue 4 - Individual Protection - ALARA Planning and associated questions
 - Webinar Participation for Third Meeting: Prior to the start of the webinar, please dial: 1-888-913-9205 and provide the operator with passcode: 95372. Please call 5-10 minutes prior to the start of the public meeting/ webinar to allow sufficient time to speak to the operator and be connected. The webinar access information is available at:
<https://www1.gotomeeting.com/register/365700456>.

- ❖ **Fourth meeting/webinar** – October 16 -OWFN- Room O3B04---1pm to 5pm
 - Facilitated discussion of Issue 6 - Reporting of Occupational Exposure and associated questions.
 - Facilitated discussion of Issue 5- Metrication - Units of Radiation Exposure and Dose and associated questions.
 - Webinar Participation for Fourth Meeting: Prior to the start of the webinar, please dial: 1-888-913-9205 and provide the operator with passcode: 95372. Please call 5-10 minutes prior to the start of the public meeting/ webinar to allow sufficient time to speak to the operator and be connected. The webinar access information is available at:
<https://www1.gotomeeting.com/register/810995104>.

- ❖ **Fifth meeting/Follow-up meeting/webinar** – October 23- OWFN-O3B04---1pm to 5pm
 - Facilitated discussion of any additional issues not fully discussed in earlier sessions
 - Discussion of path forward on project
 - Webinar Participation for Fifth Meeting: Prior to the start of the webinar, please dial: 1-888-913-9205 and provide the operator with passcode: 95372. Please call 5-10 minutes prior to the start of the public meeting/ webinar to allow sufficient time to speak to the operator and be connected. The webinar access information is available at:
<https://www1.gotomeeting.com/register/344312000>.

- ❖ **Sixth Meeting/Summary/Closeout meeting/webinar**–October 30 -OWFN-O3B04--1pm to 5pm
 - Place holder meeting to discuss input from earlier sessions
 - May or may not be needed depending upon earlier sessions and whether there is a desire from staff or stakeholders for additional discussions.

- Webinar Participation for Sixth Meeting: Prior to the start of the webinar, please dial: 1-888-913-9205 and provide the operator with passcode: 95372. Please call 5-10 minutes prior to the start of the public meeting/ webinar to allow sufficient time to speak to the operator and be connected. The webinar access information is available at:
<https://www1.gotomeeting.com/register/591177440>.

Please contact the point of contacts below with any questions regarding the Part 20 ANPR and the public meeting/webinars.

TECHNICAL POINT OF CONTACT: Cardelia Maupin
INTERNET: Maupin.Cardelia@nrc.gov
TELEPHONE: 301-415-2312

ADMINITRATIVE POINT OF CONTACT: Antoinette Walker-Smith
INTERNET: Walker-Smith.Antoinette@nrc.gov
TELEPHONE: 301-415-6390