

August 6, 2010

ALL AGREEMENT STATES, MICHIGAN

REQUEST TO PROVIDE OCCUPATIONAL RADIATION DOSE DATA FROM INDUSTRIAL RADIOGRAPHY AND NUCLEAR PHARMACY LICENSEES (FSME-10-072)

Purpose: To request occupational radiation dose data from Agreement State Radiation Control Programs on industrial radiography and nuclear pharmacy licensees to facilitate a better understanding by the U.S. Nuclear Regulatory Commission (NRC) staff of the potential impacts from a proposed reduction of the occupational radiation dose limits.

Background: On December 18, 2008, the NRC staff provided a Policy Issue Notation Vote Paper, SECY-08-0197 (ML083360582), to the Commission which presented the regulatory and technical options of moving, or not moving, towards a greater degree of alignment of the NRC radiation protection regulatory framework with the International Commission on Radiation Protection Publication 103. In a Staff Requirements Memorandum (SRM) dated April 2, 2009, SRM-SECY-08-0197 (ML090920103), the Commission approved the NRC staff's recommended option to immediately begin engagement with stakeholders and interested parties. As part of the outreach to stakeholders and interested parties, NRC staff noted the need to expand the current occupational radiation dose information contained in the Radiation Exposure Information and Reporting System (REIRS) database.

Discussion: The Office of Nuclear Regulatory Research (RES) manages the REIRS database that maintains occupational radiation dose information from specific categories of NRC licensees that are required to submit this information under 10 CFR Part 20, Section 20.2206. Currently, NRC receives occupational radiation dose information from the following NRC licensees: commercial nuclear power reactors, independent spent fuel storage installation, fuel processors (including uranium enrichment facilities), fabricators, and reprocessors, manufacturers and distributors of byproduct material, and industrial radiographers. NRC has no low-level waste and no high-level waste licensees.

The requirements to report occupation radiation dose information from specific categories of licensees and participation in the NRC's REIRS database for Agreement States is designated as Compatibility Category D provision. Agreement States are not required to adopt Compatibility Category D provisions. The collection of this information is strictly voluntary on the part of the Agreement State Radiation Control Program. However, it is our understanding that several Agreement State Radiation Control Programs do collect occupational radiation dose data.

RES is leading the effort to collect additional occupational radiation dose information for the purposes of determining potential impacts to all licensees from a proposed lower annual occupational dose limit. RES is specifically requesting occupational radiation dose information from those Agreement State Radiation Control Programs that collect this information from their industrial radiography and nuclear pharmacy licensees, from the 2000 through 2009 monitoring years. This Agreement State licensee data will be used to help expand the current occupational

radiation dose information from NRC licensees in these two license categories. Agreement State Radiation Control Programs that do not collect this information from their licensees should not request it from their licensees.

NRC requests Agreement States Radiation Control Programs to provide any information that they maintain on industrial radiography and nuclear pharmacy licensees within 30 days from the date of this letter to the contact listed below.*

Equivalent data to that found in the NRC Form 5 or the equivalent paper format would be appreciated. Electronic data in accordance with the file format specified in Regulatory Guide 8.7, Appendix C, is also acceptable.

If you have any questions regarding this communication, please contact me at 301-415-3340, or the individual named below.

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/RA/

Robert J. Lewis, Director
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* This information request has been approved by OMB 3150-0029, expiration 08/31/2010. The estimated burden per response to comply with this voluntary collection is approximately 8 hours. Send comments regarding the burden estimate to the Records and FOIA/Privacy Services Branch (T-5F52), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by Internet e-mail to infocollects@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202 (3150-0029), Office of Management and Budget, Washington, DC 20503. If a means used to impose an information collection dose not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

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