



# **REGULATIONS & STANDARDS: APPLICATIONS IN AIR MONITORING**

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**Cynthia G. Jones, Ph.D.  
Sr. Technical Advisor for Nuclear Security  
Office of Nuclear Security and Incident Response  
U.S. Nuclear Regulatory Commission**

# Overview



- NRC Mission
- P.L. 104-113 and OMB Circular A-119
- NRC Management Directive 6.5
- Requesting NRC assistance on standards
- Use of National Standards in practice
- Thoughts for future consideration in air monitoring
- Conclusions

# NRC Mission



To license and regulate the Nation's civilian use of byproduct, source, and special nuclear materials to ensure adequate

protection and common defense and security of of the public's health and safety.



# Public Law 104-113

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- *National Technology Transfer and Advancement Act (NTTAA)* signed by the President March 7, 1996
- Requires Federal agencies to:
  - ✓ Use voluntary consensus standards to the extent practicable,
  - ✓ Report development of agency-unique standards, and
  - ✓ Participate in the development of voluntary consensus standards.

# OMB Circular A-119

- Office of Management and Budget (OMB) issued Circular A-119, *Federal Participation in the Development and Use of Voluntary Consensus Standards and in Conformity Assessment Activities* (revised in 1998).
- Requires National Institute of Standards and Technology (NIST) to report annually to OMB for transmittal to Congress on the progress Federal agencies using voluntary consensus standards rather than government-unique standards
- Also requires summary on the participation of Federal agency employees on private-sector voluntary consensus standards organizations

# NRC Management Directive 6.5

- Describes NRC policy for staff participation in the development of consensus standards in support of NRC's mission
- Designates a senior NRC Standards Executive
- Provides direction to NRC staff for implementing P.L. 104-113 and OMB Circular A-119
- Gives guidance for
  - (1) staff participation in the development of consensus standards,
  - (2) identifying and prioritizing needed new and revised technical standards,
  - (3) selecting and nominating staff as authorized agency representatives on standards developing organization (SDO) committees, and
  - (4) coordinating standards activities with SDOs and other stakeholders

*See* <http://www.nrc.gov/about-nrc/regulatory/standards-dev/ref-docs.html>

# NRC Standards Executive

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- Ensures that NRC current and future needs & priorities for standards development are communicated annually to the SDOs
- Establishes procedures to ensure that NRC staff who participate in consensus standards will express NRC views
- Ensures that representatives from NRC and other Federal agencies on the same committee coordinate their views
- Establishes a process for reviewing NRC's use of standards for the purpose of updating existing references.
- Prepares Annual report to NIST

# Requests for NRC Assistance

- Letter to NRC Standards Executive:

Dr. Jennifer Uhle, NRC  
Office of Nuclear Regulatory Research  
Mail Stop T10-E10, Washington, DC 20555

- Including:
  - Purpose of standard as it relates to NRC's Mission and defined regulatory needs
  - Type of expertise requested
  - Scope of standard
  - Estimated length for project completion





Thoughts for future consideration  
regarding air monitoring....

# Uses of Air Monitoring Standards

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- USNRC Regulatory Guides
- Standard Review Plans
- Licensing & inspection guidance
- NUREG Documents
- Licensee documentation

# Licensees Referencing Air Monitoring Standards

- Reactors & research reactors
- Research & development
- Academic and Limited Scope licensees
- Manufacturers & Distributors
- Medical
- Radiopharmaceutical facilities
- Field flood studies

# DHS Protective Action Guides for RDDs and INDs

- Issued for interim use and comment Jan 3, 2006
- Guidance represent Federal consensus
- Based on 1992 EPA *Manual of Protective Action Guides and Protective Actions for Nuclear Incidents (EPA 400-R-92-001)*
- Early phase guidelines: 1 – 5 rem, with an understanding that doses above 5 rem may be unavoidable for first responders performing life saving missions.
- Intermediate phase: 2 rem first year
- Late phase (subsequent years): 500 mrem/yr projected dose
- Opportunities for air monitoring planning activities for emergency preparedness and during response

# Conclusions

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- Understand & use P.L.104-113 to your advantage
- Maximize standards committees hard work by requesting assistance from Federal agencies to endorse final standard in regulatory applications
- Document request in writing
- Contact agency Standards Executive if further assistance is needed
- Look for air monitoring applications in new areas
- *Result:* Improved & strengthened regulatory infrastructure

Thank you!



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