

NRC Update on Federal Regulatory Activities Affecting Industrial Radiography

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Topics

- Electronic Dosimeters
- 10 CFR Part 34 Rulemaking
- 10 CFR Part 37 Activities

Electronic Dosimeters

Dosimetry Enforcement Discretion

- EGM-18-001 issued on May 11, 2018
- EGM provided enforcement discretion for the use of direct ion storage dosimetry
- RIS 2018-04 issued September 11, 2018
Notice of Issuance of Enforcement Guidance Memorandum—Interim Guidance for Dispositioning Apparent Violations of 10 CFR Parts 34, 36, and 39 Requirements Resulting from the Use of Direct Ion Storage Dosimetry During Licensed Activities

10 CFR Part 34 Rulemaking

Individual Monitoring Devices

Direct Final Rule

- PRM 34-7: Rulemaking approved to go forward as a direct final rule by the NRC Commission on January 4, 2019
- NRC staff developing final rule language
- Rule should be issued in 2020

Revised Radiation Safety Requirements Rule

- PRM 34-6: Clarification to Training, Surveillance, and the Two Man Rule
- Petition Proposed Changes to the following:
 - 34.41(a): two qualified individuals present, but second person no longer required to observe the operations
 - 34.43: revise training requirements for radiographers and radiographer's assistants regarding number of training hours
 - 34.47: combined dosimetry devices
 - 34.51: eliminate that the other individual present maintain continuous direct visual surveillance
- NRC Evaluating Next Steps for Addressing Issues Raised in the PRM

10 CFR Part 37 Activities

Current Part 37 Activities

- Revisions to NUREG-2155 ongoing
- NRC provided responses to the 2018 GAO Audit in January 2019
 - Audit addressed implementation of Part 37 by NRC and Agreement State licensees
- Task Force on Radiation Source Protection and Security

<https://www.nrc.gov/security/byproduct.html>

Regulatory Information Summaries (RIS)

- RIS 2018-03 issued June 1, 2018

National Terrorism Advisory System and Protective Measures for the Physical Protection of Category 1 and Category 2 Quantities of Radioactive Material

- RIS 2018-01 ERRATA issued March 1, 2018

Common Violations Cited During First 2 Years of 10 CFR Part 37, “Physical Protection of Category 1 and Category 2 Quantities of Radioactive Material” Implementation and Guidance Documents Available to Support Rule Implementation

<https://www.nrc.gov/reading-rm/doc-collections/gen-comm/reg-issues/>

Pending Commission Papers - Security

- SECY-17-0083: Category 3 initiative - rulemaking recommendations
 - Amend 10 CFR Parts 30, 40, and 70 to require safety and security equipment to be in place before granting a license for an unknown entity.
 - Amend 10 CFR Parts 30, 40, and 70 to clarify license verification methods for transfers involving quantities of radioactive material below Category 2.
- SECY-16-0115: Financial Assurance proposed rulemaking plan for Category 1 and 2 quantities of materials
- Rulemaking aspects of these initiatives part of integrated rulemaking plan (SECY-17-0025)

Questions?

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