A. INTRODUCTION

Section 20.1502 of 10 CFR Part 20, "Standards for Protection Against Radiation," requires licensees to provide radiation monitoring for all occupationally exposed individuals who might receive a dose in excess of 10 percent of the limits in 10 CFR 20.1201, 20.1207, or 20.1208. In 10 CFR 20.2106, licensees are required to maintain records of the radiation exposures of all individuals for whom personnel monitoring is required (pursuant to 10 CFR 20.1502). According to 10 CFR 20.2104, the dose in the current monitoring year must be determined for all persons who must be monitored, and this information must be recorded on NRC Form 4 or equivalent. In addition, 10 CFR 20.2104 requires that, prior to allowing an individual to participate in a planned special exposure, records of all prior exposures must be acquired. Records of prior dose must be maintained on NRC Form 4 or its equivalent. Further, 10 CFR 20.2206 requires certain licensees to submit an annual report to NRC of the results of individual monitoring.
This guide describes an acceptable program for the preparation, retention, and reporting of records of occupational radiation exposures. It includes copies of NRC Forms 4 and 5 and detailed instructions on completing them.

Any information collection activities mentioned in this regulatory guide are contained as requirements in 10 CFR Part 20, which provides the regulatory basis for this guide. The information collection requirements in 10 CFR Part 20 have been cleared under OMB Clearance No. 3150-0014. The existing requirements for NRC Forms 4 and 5 were approved by the Office of Management under approval numbers 3150-0005 and 3150-0006. The amended information collection requirements reflected in this guide and contained on the revised NRC Forms 4 and 5 will not become effective until after they are approved by the Office of Management and Budget. Notice of OMB approval will be published in the Federal Register.

**B. DISCUSSION**

This guide is structured to reflect the process a licensee would go through in deciding whether or not monitoring for occupational exposure to radiation is required under the revised 10 CFR Part 20. The guide describes acceptable methods for determination of prior exposures, records of monitoring provided, and reporting that are needed to comply with 10 CFR Part 20. NRC Forms 4 and 5 are provided. A format for electronically reporting exposure data to NRC is provided in Appendix A.

In order to avoid confusion with the acronym for effective dose equivalent (EDE), the abbreviation LDE is used to represent the eye (lens) dose equivalent, as defined in 10 CFR Part 20. The term total organ dose equivalent (TODE) has been added, and it means the sum of the deep dose equivalent and the committed dose equivalent to the organ receiving the highest dose as described in 10 CFR 20.2106(a)(6).

**C. REGULATORY POSITION**

1. **DETERMINATION OF MONITORING REQUIREMENTS**

According to 10 CFR 20.1502, if an adult is likely to receive in 1 year a dose greater than 10 percent of any applicable limit, monitoring is required. The licensee should perform an evaluation of the dose the individual is likely to receive prior to allowing the individual to receive the dose. This evaluation need not be made for every individual; evaluations can be made for employees with similar job functions or work areas. Further guidance on evaluating the need to provide monitoring is provided in Regulatory Guide 8.34, "Monitoring Criteria and Methods To Calculate Occupational Doses."

1.1 If Monitoring Is Not Required

If this prospective evaluation shows that the individual is not likely to exceed 10 percent of any applicable limit, there are no recordkeeping or reporting requirements in regard to the individual’s exposure. For individuals who received exposure at other facilities in the current year, the previous dose need not be considered in this prospective evaluation. Only dose that could be received at the facility performing the
evaluation need be considered when determining the need for monitoring and, therefore, the recordkeeping and reporting requirements. If it is determined that monitoring is not required and a subsequent evaluation shows that the 10 percent threshold has or will be exceeded, the dose received when monitoring was not provided should be estimated, recorded, and reported. These estimates can be based on any combination of work location radiation monitoring or survey results, monitoring results of individuals in similar work situations, or other estimates to produce a "best estimate" of the actual dose received.

If monitoring is not required to demonstrate compliance with all limits but is required relative to one or more specific limits, the licensee should enter "NR" in the blocks on NRC Forms 4 and 5 to indicate the areas for which monitoring was not required (e.g., extremity or skin doses). Where monitoring was provided but not measurable, the licensee should enter "ND" for "Not Detectable."

1.2 If Monitoring Is Required

If the prospective evaluation shows that the individual is likely to exceed 10 percent of an applicable limit, monitoring is required (10 CFR 20.1502). Recording and reporting of the results of monitoring performed, regardless of the actual dose received, is required by 10 CFR 20.2106(a) and 20.2206(b) respectively.

1.3 Documentation of Prior Exposures

For those individuals for whom monitoring is required, determination of current year exposure at other facilities is required by 10 CFR 20.2104. To document the determination of current year exposure, the individual to be monitored must provide an NRC Form 4 signed by the individual or a written statement that includes the names of all facilities that provided monitoring for occupational exposure to radiation during the current year and an estimate of the dose received. Although not required by the regulations, it is considered good health physics practice to verify the information provided by the individual. Verification may be documented with:

- An NRC Form 5 for each listed monitoring period, or
- Electronic, telephone, or facsimile transfer of dose data provided by licensees listed on the written statement, or
- An NRC Form 4 countersigned by a licensee or current employer.

In addition, 10 CFR 20.2104(a)(2) requires that licensees attempt to obtain the records of lifetime cumulative occupational radiation dose. To demonstrate compliance with this requirement, the individual to be monitored may provide a written estimate of the cumulative lifetime dose or an up-to-date NRC Form 4 signed by the individual. This information need not be verified so long as the individual does not participate in a planned special exposure.

NRC Forms 4 and 5 and termination letters or reports, which report the results of monitoring prior to implementation of the revised 10 CFR Part 20, may be used without recalculating dose according to the requirements of the revised 10 CFR Part 20. For the purpose of
assessing prior dose, whole body dose in rem as reported on the old (1981 or earlier) NRC Forms 4 and 5 can be considered equivalent to total effective dose equivalent (TEDE).

1.4 Records of Prior Exposure for Persons Participating in Planned Special Exposures

If there are any periods of exposure during the life of the monitored individual that have not been determined and documented, participation in a planned special exposure is not permitted. Acceptable documentation of prior exposure is similar to that required for documenting current-year exposure. Alternatively, the licensee may request in writing that a report of the monitored individual's exposure history be provided by the NRC. To request an exposure history, the licensee may send a request signed by the monitored individual to:

    REIRS Project Manager
    Office of Nuclear Regulatory Research
    U. S. Nuclear Regulatory Commission
    Washington, DC 20555

The request should contain the social security number (or other unique identifying number) of the monitored individual authorizing release of the information and the name and address of the person or licensee to whom the report should be sent. The REIRS database contains only reports submitted by the seven classes of licensees required by 10 CFR Part 20 to report occupational exposures. Any missing monitoring periods should be obtained directly from licensees.

1.5 Individuals with No Social Security Number

Doses to individuals who do not have a social security number, such as citizens of foreign countries, should be reported using another unique identification number. It is important to record the type of identification used in the data block labeled "ID type" that follows the "Identification Number" data block on NRC Form 4 and 5. The appropriate code listed below should be inserted in the blank labeled ID Type.

The use of licensee-generated identification numbers should be avoided whenever possible.

2. RECORDS OF MONITORING RESULTS FOR INDIVIDUALS FOR WHOM MONITORING IS REQUIRED

The preparation of NRC Form 5 with the information clearly and legibly shown, or the collection of all the information requested by NRC Form 5 using paper or electronic media (see Appendix A), is required by 10 CFR 20.2106. Such a record must be maintained for each individual for whom personnel monitoring is required by 10 CFR 20.1502. In addition, certain classes of licensees report the results of this monitoring to NRC pursuant to 10 CFR 20.2206 either by submitting copies of NRC Form 5 or by transmitting the required information to NRC through electronic media. This report is filed annually. Instructions and additional information pertinent to each item are contained on
2.1 Multiple Badges

Further guidance on interpreting the results of multiple dosimetric devices placed at different locations within a single dose category is provided in Regulatory Guide 8.34, "Monitoring Criteria and Methods To Calculate Occupational Doses."

2.2 Dose Calculations for CDE and TODE to the Maximally Exposed Organ

Licensees are required by 10 CFR 20.2106(a)(6) to record the total organ dose equivalent (TODE), which is the sum of the deep dose equivalent (DDE) and the committed dose equivalent (CDE) to the organ receiving the highest dose. Organ doses need not be calculated if the committed effective dose equivalent (CEDE) does not exceed 1 rem and there are no overexposure in any dose category within the monitoring year, including doses previously reported by other licensees. In this case, the licensee may record "NC" for "Not Calculated" in items 16 and 18 on NRC Forms 4 and 5. If during the course of the year the dose to date for the year exceeds 1 rem CEDE or the individual receives an overexposure in another dose category, the CDE to the maximally exposed organ must be calculated, recorded, and reported. When CDE and TODE to the maximally exposed organ must be calculated, the licensee should refer to Regulatory Guide 8.34, "Monitoring Criteria and Methods To Calculate Occupational Doses."

2.3 Dose to the Embryo/Fetus

A declared pregnant worker is a worker who has voluntarily informed her employer in writing of her pregnancy and the estimated month and year of conception. The embryo/fetus' dose for the entire gestation period must be recorded (10 CFR 20.2106(e)), but need not be included on NRC Forms 4 and 5. Multiple records are not required in the case of twins, triplets, etc. Any dose measured to demonstrate compliance with 10 CFR 20.1208 must be recorded.

Licensees should be sensitive to the issue of personal privacy with regard to embryo/fetus dose. If requested by the monitored woman, a letter report may be provided to subsequent licensees to document prior embryo/fetus dose. Further guidance on assessing dose to the embryo/fetus is provided in Regulatory Guide 8.36, "Radiation Dose to the Embryo/Fetus."

2.4 Transmittal of Reports to the NRC

Certain licensees are required by 10 CFR 20.2206(c) to submit reports of monitoring for the previous year to NRC on or before April 30. These reports should be sent to:

REIRS Project Manager
Office of Nuclear Regulatory Research
U.S. Nuclear Regulatory Commission
Washington, DC 20555

http://www.nrc.gov/NRC/RG/08/08-007r1.html
According to 10 CFR 20.2206(b), "...The licensee shall use Form NRC 5 or electronic media containing all the information required by Form NRC 5."

2.5 Electronic Reporting of Exposure Data

Licensees are encouraged to record and report these data electronically. The format for reporting radiation exposure data in an electronic, machine-readable format is provided in Appendix A of this guide.

D. IMPLEMENTATION

The purpose of this section is to provide information to applicants and licensees regarding the NRC staff's plan for using this regulatory guide.

Except in those cases in which an applicant proposes an acceptable alternative method for complying with specified portions of the Commission's regulations, the methods described in this guide will be used in the evaluation of applications for new licenses, license renewals, and license amendments and for evaluating compliance with 10 CFR 20.1001-20.2401.

Cumulative Occupational Exposure History Part 1

Cumulative Occupational Exposure History Part 2

Occupational Exposure Record for a Monitoring Period Part 1

Occupational Exposure Record for a Monitoring Period Part 2

APPENDIX A

FORMAT FOR ELECTRONIC TRANSMISSION OF EXPOSURE DATA

Introduction

The following outlines a means by which licensees may satisfy the requirements of 10 CFR 20.2206, "Reports of Individual Monitoring," in an electronic format by submitting magnetic disks, cartridges, or tape with formatted radiation exposure data.

Media Requirements

The following data storage media are compatible with the Radiation Exposure Information Reporting System (REIRS). The electronic media listed below are preferred by NRC for these submissions and are presented in the order of preference. However, licensees are
encouraged to submit data on whatever system is compatible with their existing systems. Other forms of data submission may also be acceptable. NRC will provide additional guidance to licensees upon request to the REIRS Project Manager.

PC Diskettes
3½" or 5¼"
Double sided, high or double density
Standard IBM-DOS format
ASCII character format
Magnetic Tape
8 mm tape cartridges
Data quality
ASCII or EBCDIC format

Transmittal Letters

With the submission of each disk, tape, or cartridge, the licensee should also submit a transmittal letter containing information that will minimize processing time and help resolve possible discrepancies. Each letter should contain the following information as a minimum:

- File name Descriptive name of the file or files contained on the disk.
- Date Created Date each file was created.
- Operating system Operating system and version used to format the disk.
- Contact Name and telephone number of the person knowledgeable about each file.
- Other instructions Comments or explanation regarding the submission, the actual date, the data format, or the other important information.
- Signature and date Dated signature of the licensee's authorized representative responsible for the data.

Expected Data

One routine Form 5 is expected for each monitored individual at the facility for the monitoring year. There may also be a Form 5 for a planned special exposure for some individuals. Because there should be few repetitions of employee information, the employee information is included in the Form 5. The primary license number is also included in each Form 5 to ensure that the records are assigned to the proper facility.
File Structure

The file structure consists of a Header Record, which provides information about the source of the data file, followed by Form 5 dose records and supporting Form 5 intake records. Each record contains only ASCII or EBCDIC printable characters and is terminated with a Carriage Return (CR) and a Line Feed (LF). All empty space in a field is padded with spaces. Text strings are expected to be left justified in a field and numbers are expected to be right justified in a field.

Header Record

The following record type occurs only once at the top of each data file to identify the source of the data.

<table>
<thead>
<tr>
<th>Field</th>
<th>Width</th>
<th>Start Col.</th>
<th>End Col.</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Primary_License</td>
<td>13</td>
<td>1</td>
<td>13</td>
<td>Primary NRC License number.</td>
</tr>
<tr>
<td>Preparation_Date</td>
<td>8</td>
<td>15</td>
<td>22</td>
<td>Date the record was written to the data file formatted as 'YYYYMMDD.'</td>
</tr>
<tr>
<td>Licensee_Name</td>
<td>72</td>
<td>24</td>
<td>95</td>
<td>Name of NRC licensee.</td>
</tr>
<tr>
<td>Contact</td>
<td>72</td>
<td>97</td>
<td>168</td>
<td>Name of person to contact for further information about this data file.</td>
</tr>
<tr>
<td>Phone_Number</td>
<td>14</td>
<td>170</td>
<td>183</td>
<td>Contact's phone number.</td>
</tr>
<tr>
<td>Other_License_1</td>
<td>13</td>
<td>185</td>
<td>197</td>
<td>Other related NRC license numbers.</td>
</tr>
<tr>
<td>Other_License_2</td>
<td>13</td>
<td>199</td>
<td>211</td>
<td>Other related NRC license numbers.</td>
</tr>
<tr>
<td>Other_License_3</td>
<td>13</td>
<td>213</td>
<td>225</td>
<td>Other related NRC license numbers.</td>
</tr>
<tr>
<td>Other_License_4</td>
<td>13</td>
<td>227</td>
<td>239</td>
<td>Other related NRC license numbers.</td>
</tr>
<tr>
<td>Other_License_5</td>
<td>13</td>
<td>241</td>
<td>253</td>
<td>Other related NRC license numbers.</td>
</tr>
<tr>
<td>Other_License_6</td>
<td>13</td>
<td>255</td>
<td>267</td>
<td>Other related NRC license numbers.</td>
</tr>
<tr>
<td>Other_License_7</td>
<td>13</td>
<td>269</td>
<td>281</td>
<td>Other related NRC license numbers.</td>
</tr>
<tr>
<td>Other_License_8</td>
<td>13</td>
<td>283</td>
<td>295</td>
<td>Other related NRC license numbers.</td>
</tr>
<tr>
<td>Other_License_9</td>
<td>13</td>
<td>297</td>
<td>309</td>
<td>Other related NRC license numbers.</td>
</tr>
<tr>
<td>Other_License_10</td>
<td>13</td>
<td>311</td>
<td>323</td>
<td>Other related NRC license numbers.</td>
</tr>
</tbody>
</table>

Form 5 Dose Record

The following record type occurs once for each Form 5 being reported. It is followed by zero or more Form 5 Intake Records.

<table>
<thead>
<tr>
<th>Field</th>
<th>Width</th>
<th>Start Col.</th>
<th>End Col.</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Employee_ID</td>
<td>12</td>
<td>1</td>
<td>12</td>
<td>SSN, PPN, CSI, WPN, IND, or OTH. IDs should have no punctuation.</td>
</tr>
<tr>
<td>ID_Type</td>
<td>3</td>
<td>14</td>
<td>16</td>
<td>'SSN,' 'PPN,' 'CSI,' 'WPN,' 'IND,' or 'OTH'</td>
</tr>
</tbody>
</table>
The following record should be provided for each intake on the Form 5 being reported.

<table>
<thead>
<tr>
<th>Field</th>
<th>Width</th>
<th>Start Col.</th>
<th>End Col.</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Employee_ID</td>
<td>12</td>
<td>1</td>
<td>12</td>
<td>IDs should have no punctuation.</td>
</tr>
<tr>
<td>ID_Type</td>
<td>3</td>
<td>14</td>
<td>16</td>
<td>'SSN,' 'PPN,' 'CSI,' 'WPN,' 'IDL,' 'IND,' or 'OTH'</td>
</tr>
<tr>
<td>Primary_License</td>
<td>13</td>
<td>18</td>
<td>30</td>
<td>Primary NRC license number</td>
</tr>
</tbody>
</table>
This is the date from the parent **Form 5 Dose Record** formatted as 'YYYYMMDD.'

**Record Type**

- 'I' = Intake

**Radionuclide**

Radionuclide abbreviation with the hyphen.

**Class**

- 'D,' 'Y,' 'W,' 'V,' or 'O' for other.

**Mode**

- 'H' = Inhalation, 'B' = Absorption, 'J' = Injection, 'G' = Ingestion

Intake

The amount of µCi for the radionuclide. This can be expressed in scientific notation using the format '+9.999E+99' or as a decimal number of less than 9 digits.

**Form 5 Comment Record**

The following record type occurs only when comments are necessary to explain special exposure calculations or overexposures.

<table>
<thead>
<tr>
<th>Field</th>
<th>Width</th>
<th>Start Col.</th>
<th>End Col.</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Employee_ID</td>
<td>12</td>
<td>1</td>
<td>12</td>
<td>IDs should have no punctuation.</td>
</tr>
<tr>
<td>ID-Type</td>
<td>3</td>
<td>14</td>
<td>16</td>
<td>'SSN,' 'PPN,' 'CSI,' 'WPN,' 'IDL,' 'IND,' or 'OTH'</td>
</tr>
<tr>
<td>Primary_License</td>
<td>13</td>
<td>18</td>
<td>30</td>
<td>Primary NRC license number.</td>
</tr>
<tr>
<td>Preparation_Date</td>
<td>8</td>
<td>32</td>
<td>39</td>
<td>This is the date from the parent <strong>Form 5 Dose Record</strong> formatted as 'YYYYMMDD.'</td>
</tr>
<tr>
<td>Record_Type</td>
<td>1</td>
<td>41</td>
<td>41</td>
<td>'C' = Comment</td>
</tr>
<tr>
<td>Comment</td>
<td>240</td>
<td>43</td>
<td>282</td>
<td>Explanatory comment when needed.</td>
</tr>
</tbody>
</table>

**REGULATORY ANALYSIS**

A separate regulatory analysis was not prepared for this regulatory guide. The regulatory analysis prepared for 10 CFR Part 20, "Standards for Protection Against Radiation" (56 FR 23360), provides the regulatory basis for this guide and examines the costs and benefits of the rule as implemented by the guide. A copy of the "Regulatory Analysis for the Revision of 10 CFR Part 20" (PNL-6712, November 1988), is available for inspection and copying for a fee at the NRC Public Document Room, 2120L Street NW., Washington, DC, as an enclosure to Part 20.