

March 1, 2000

MEMORANDUM TO: Annette Vietti-Cook, Secretary
FROM: Nils J. Diaz
SUBJECT: COMSECY-00-0009 - RULEMAKING ON DISCRETE RADIOACTIVE PARTICLE DOSE
CONSTRAINT

I approve the staff's recommendation to initiate rulemaking that would establish a single, unified skin dose limit that would apply to any shallow dose equivalent to the skin regardless of the source or geometry of the irradiation. However, instead of issuing a grant to NCRP as noted in the paper, the staff should issue a contract to NCRP to perform the desired work. With respect to the schedule provided in [COMSECY-00-0009](#), I believe there is no reason for the staff to develop and provide a formal rulemaking plan to the Commission. In addition, since the staff noted during the February 15, 2000, briefing of the Commission's Technical Assistants that NCRP has informally endorsed the staff's proposal, the staff should develop the proposed rule in parallel with the work that will be performed by NCRP. The staff should provide the proposed rule to the Agreement States for comment and provide the proposed rule to the Commission within 12 months.