

65 FR 70742
Nov. 27-2000
AMRSO

Academic & Medical Radiation Safety Officers ①

November 22, 2000

Chief Rules and Directive Branch
Division of Administrative Services
Office of Administration
U.S. Nuclear Regulatory Commission
Washington DC 20555-0001

Reference: NUREG-1736, "Consolidated Guidance About Materials Licenses – Consolidated Guidance: Standards for Protection Against Radiation in 10 CFR Part 20 Draft Report for Comment"

Gentlemen,

I am writing this comment on the referenced publication on behalf of the Academic and Medical Radiation Safety Officers group (AMRSO). The AMRSO is an informal organization composed of over 200 health physicists at over 175 institutions. Members are intimately involved in their institutions' radiation safety programs and nearly all AMRSO members are responsible for these programs. This letter reflects the consensus of AMRSO members in this matter, a matter that concerns us and may have a significant impact on our institutions. Please note that the opinions expressed in this letter are our individual opinions as professional health physicists. They are not intended to reflect the positions of our institutions, either singly or collectively. Specifically, these opinions do not represent those of the Denver VA Medical Center, the Department of Veterans Affairs, or the United States Government.

I received the referenced publication on November 9, 2000 in spite of the publication date of September 2000. The document in soliciting comments reads, "Please submit comments within 90 days of the draft report's publication." Assuming that the time it took me to receive the publication is average, most people will have only 50 days in which to comment. Anyone requesting a copy and receiving it by mail will have 10 to 14 days less time in which to review it and submit comments. This document is about 350 pages long and affects every NRC licensee and most agreement state licensees. Because of this, the AMRSO group feels even the original 90 days is an insufficient time to conduct a thorough review and to submit considered comments and that this problem is exacerbated by the unavoidable delay imposed by distributing them by mail. We feel that, otherwise, it will be difficult for interested licensees to provide the considered feedback that is the purpose of having a review period.

The Nuclear Regulatory Commission's [NRC] guidance documents are of great importance as they are one of the primary sources of procedures for incorporation into license applications. NRC license reviewers will accept a reference to a model procedure in lieu of licensee-developed procedures. While this document does not appear to have model procedures, its guidance may be referenced and cited to support procedures prepared by licensees of both the NRC and agreement states.

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E-RIDS-ADM-03
All-C. Brown (CXB)

We feel that everyone's interests are best served by having solid guidance in which both the NRC and the regulated community have confidence, that provides a strong assurance of safety, and that does not impose a needless burden on the licensee. It is for this reason that we request that the Nuclear Regulatory Commission extend the official comment period for the referenced publication to March 31, 2001.

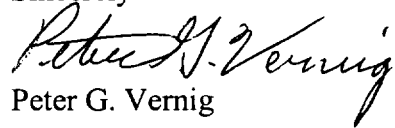
Questions concerning this request or the AMRSO group may be addressed to:

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or to myself:

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303-399-8020, ext. 2447.

Sincerely

A handwritten signature in black ink, appearing to read "Peter G. Vernig", written in a cursive style.

Peter G. Vernig

CC: Andrew Karam

Attachments: List of AMRSO members

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