Subject: **Email from Ralph Andersen, of NEI, as followup to 9/25/03 meeting on radiation protection for inclusion in meeting summary**
To: **Steve Klementowicz, NRC/NRR/IEPB**
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From: "ANDERSEN, Ralph" <rla@nei.org>
To: <sxk@nrc.gov>
Date: 9/26/03 3:23PM
Subject: Comments on the Draft Public Radiation Safety SDP (Appendix D to 0609)

At our September 25 public meeting, I committed to forward any remaining comments we might have on the proposed revision to the Public Radiation Safety Significance Determination Process (SDP).

We have a single comment in regard to the last paragraph of the proposed revision to the SDP that addresses discrete radioactive particles.

In light of the rulemaking last year that establishes a 10 cm-2 averaging for SDE, as well as the recent issuance of Regulatory Information Summary (RIS) 2003-04, which allows the use of effective dose equivalent, we believe that particles no longer need to be treated differently then distributed contamination.

We suggest that the last paragraph (i.e., specifically regarding particles) be deleted. This suggestion is made on the assumption that NRC will proceed with the planned revision to equate findings to "a failure or performance deficiency" of the licensee's program that results in licensed material being improperly released beyond the restricted or protected area. In such cases (i.e., involving a failure or performance deficiency), a particle found outside a restricted or protected area would be a finding.

The significance of the finding would be based on the calculated total effective dose equivalent (TEDE), which can now be calculated as the effective dose equivalent (EDE) for external exposures from particles.