

May 19, 2008

Ruth E. McBurney, CHP
Executive Director
Conference of Radiation Control Program Directors, Inc.
205 Capital Avenue
Frankfort, KY 40601

Dear Ms. McBurney,

U.S. Nuclear Regulatory Commission (NRC) recently received a request from the International Atomic Energy Agency (IAEA), as a Member State, to review and provide comments on a draft Safety Guide, "Radiation Safety in Industrial Radiography" (pdf file - Attachment 1). The draft guide includes guidance on X-ray and electron beam radiography, as well as, isotope radiography. We would appreciate the Conference coordinating and consolidating comments from State representatives as it deems appropriate. We will then consolidate the Conference's comments with any NRC comments regarding isotope radiography aspects of the guide and forward them on to the IAEA. Comments are due to my office by July 23, 2008.

IAEA states that the objective of the document is to "... provide recommendations for the application of the requirements of the *International Basic Safety Standards for Protection Against Ionizing Radiation and for the Safety of Radiation Sources* (1996) to the practice of industrial radiography." IAEA further notes that the Study Guide "... provides specific practical guidance on the safe use of radiation sources in industrial radiography, both in shielded facilities and during site radiography operations and that "the target audience includes both regulators and operating organizations involved in industrial radiography."

IAEA requests that comments on the document be provided in accordance with guidance given in a Explanatory Note which notes that the guidance was prepared within the IAEA's safety standards program and has already been reviewed through consultant's meetings and by its Radiation Safety Standards Committee.

The IAEA specifically requests comments with regard to the following:

- "relevance and usefulness; are the stated objectives of the standard appropriate, and are they met by the document?"
- "scope and completeness: is the stated scope appropriate, and is that scope adequately covered by the document?"
- "quality and clarity: do the requirements/guidance in the document represent the current consensus among specialists in the field, and are they expressed clearly and coherently?"

The IAEA further notes that editorial comments will be considered, the document will be comprehensively edited by the Secretariat and asks that comments be documented on the enclosed form (Attachment 2).

As you know, the United States does not specifically adopt IAEA standards and guides. Nevertheless, we believe it is important to take advantage of each opportunity to influence the IAEA documents towards requirements and guidance that are consistent with our regulatory approaches. These reviews also provide the opportunity to ensure that materials used internationally reflect our activities, experience, and lessons learned.

The Project Manager for the effort is Bruce Carrico who may be reached at 301-415-7826, or by Email at jbruce.carrico@nrc.gov.

Thank you in advance for your and the Conference's time and consideration.

Sincerely,

/RA by James Luehman Acting for/
Robert J. Lewis, Director
Division of Materials Safety
and State Agreements
Office of Federal and State Materials
and Environmental Management Programs

Enclosures:

1. Draft safety guide,
"Radiation Safety in Industrial Radiography" (pdf file)
2. Comment form

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OFC	DMSSA/SAISB	DMSSA/SAISB	FSME/DILR	FSME/DMSSA
NAME	BCarrico:tyh	ADWhite	DCool	JLuehman for RLewis
DATE	05/12/08	05/12/08	05/19/08	05/19/08

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