Georgia Department of Natural Resources
4220 International Parkway, Suite 100, Atlanta, Georgia 30354
Noel Holcomb, Commissioner
Environmental Protection Division
Carol Couch, Ph.D., Director
(404) 362-2675

August 12, 2008

James G. Luehman, Deputy Director
Division Materials Safety and State Agreements
Office of Federal and State Materials and
Environmental Management Programs
U.S. Nuclear Regulatory Commission
T8-E24
Washington, D.C. 20555-0001

Dear Mr. Luehman:

Enclosed is a copy of the revisions to the proposed Radiological Health Rules for Georgia Chapter 391-3-17, Rules and Regulations for Radioactive Materials, with a revision date of July 1, 2008. The Environmental Protection Division (EPD) briefed the Georgia Department of Natural Resources (DNR) Board members on the proposed rules on March 25, 2008. The proposed revisions were first made available for public comments through a memorandum dated March 26, 2008 and via EPD's website, with a request date for comments by May 23, 2008. A public meeting was held on April 21, 2008, and a public hearing was held on May 5, 2008 on the proposed rule amendments. After the public comment period, the Division made a few corrections, and briefed the DNR Board members again on June 24, 2008. EPD re-noticed the proposed rules in July 2008 with the corrected errors, and anticipates taking the proposed rules to the DNR Board in September 2008 for final adoption. We request NRC's comments by September 15, 2008. The proposed regulations are identified by showing additions with underlines and deletions with ~~strikethroughs~~, and correspond to the following equivalent amendments to NRC's regulations.

Rats ID	Title	State Section
2002-1	Revision to Skin Dose Limits - Part 20	Chapter 391-3-17-.01, Definitions. Amended Chapter 391-3-17-.03, Standards for Protection Against Radiation. Amended
2003-1	Financial Assurance for Materials Licensees – Parts 30, 40, 70	Chapter 391-3-17-.02, Licensing of Radioactive Materials. Amended
2004-1	Compatibility with IAEA Transportation Safety Standards and Other Transportation Safety Amendments - Part 71	Chapter 391-3-17-.06, Transportation of Radioactive Materials. Amended
2005-1	Security Requirements for Portable Gauges Containing Byproduct Material - Part 30	Chapter 391-3-17-.02, Licensing of Radioactive Materials. Amended

2005-2	Medical Use of Byproduct Material - Recognition of Specialty Boards, Part 35	Chapter 391-3-17-.05, Use of Radionuclides in the Healing Arts. Amended
2006-1	Minor Amendments – Parts 20, 30, 32, 35, 40, 70	Chapters 391-3-17-.02., .03 and .05. Amended
2006-2	National Source Tracking System - Serialization Requirements –Parts 32 (with reference to Part 20 Appendix E)	Chapter 391-3-17-.03 Standards for Protection Against Radiation. Amended (Previously Issued a License Condition)
2006-3	National Source Tracking System – Part 20	Chpater391-3-17-.03, Standards for Protection Against Radiation. Amended
2007-1	Medical Use of Byproduct Material -	Chapter 391-3-17-.05, Use of Radionuclides in the Healing Arts. Amended

We believe that adoption of these revisions satisfies the compatibility and health and safety categories established in the Office of Federal and State Materials and Environmental Programs (FSME) Procedure SA-200.

If you have any questions, please feel free to contact me at (404) 362-2675 or csanders@dnr.state.ga.us

Sincerely,

Cynthia Sanders
Environmental Health Protection Manager
Georgia Radiation Control Program

Enclosures