



148

RECORD #148

TITLE: 10 CFR 20.103(b) (2)

FICHE: 38282-323



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

JUN 26 1980

MEMORANDUM FOR: A. B. Davis, Chief, FFMS Branch, Region III

FROM: Leo B. Higginbotham, Assistant Director, Division of Fuel
Facility and Materials Safety Inspection, IE

SUBJECT: 10 CFR 20.103(b)(2)

Reference: Memo, Fisher to Higginbotham, 12/11/79, AITS F03082979H08
(copy enclosed)

In 20.103(b)(2), the 40 MPC-hour control measure is not a limit except for recurrence of exposure to greater than 40 MPC-hours. You asked if it is a "citable" recurrence if the second instance occurs, for example, at a university in a different department in a different building, perhaps, even, on a different campus.

The answer is yes, if the location and workers involved in the recurrence are governed by the same licensee system of management controls as the first occurrence. I believe the reason is evident--the corrective action for the first instance should be broad and comprehensive enough to correct the problem throughout the operation where the potential for the problem exists, not confined just to the particular locale or segment of the operation where the incident did in fact happen.

A handwritten signature in dark ink, appearing to read "Leo B. Higginbotham", is written over the typed name.

Leo B. Higginbotham
Assistant Director
Division of Fuel Facility and
Materials Safety Inspection, IE

cc: G. H. Smith, R. I
J. P. Stohr, R. II
G. D. Brown, R. IV
H. G. Book, R. V