

SEP 18 1979

Mr. David G. Hawkins  
Assistant Administrator for Air, Noise,  
and Radiation  
U.S. Environmental Protection Agency  
401 M Street, SW. Waterside Mall  
Washington, DC 20460

Dear Mr. Hawkins:

The purpose of this letter is to inform you of an action we are initiating to update our radiation protection standards.

The radiation protection standards embodied in NRC regulations were initially contained primarily in 10 CFR Part 20. Over the almost 20 years since initial publication there have been a number of amendments to Part 20 as well as to other parts of 10 CFR related to radiation protection. The result has been a patchwork of regulatory requirements that, while workable, are overly complex, unconnected, and difficult to follow. In addition, a number of significant developments have occurred over this same time period, notable among these being the abolishment of the AEC and concurrent establishment of the NRC, and the transfer of certain Atomic Energy Act responsibilities to the EPA. Also, over this period, there has been a significant increased understanding of the health effects of ionizing radiation and a growing degree of sophistication in radiation protection philosophy. The present NRC radiation protection regulations do not consistently and uniformly reflect these changes.

Several recent federal actions (e.g., the Clean Air Act amendments and promulgation of 40 CFR Part 190 by EPA), recent recommendations of national and international scientific groups (e.g. NCRP, ICRP, and NAS), and significant new initiatives in radiation protection that are on the immediate horizon (e.g. new occupational exposure guidance by EPA, and the possible establishment of a Federal Radiation Policy Council), all indicate the need to reexamine the existing NRC radiation protection standards with a view toward modernizing them, simplifying them, and structuring them to be more readily responsive to the changing state-of-the-art in radiation protection.

For these reasons, we are initiating a rulemaking proceeding that will lead to a restructured Part 20. As a first step, an NRC task force has been established to lay the groundwork for a major review of the NRC radiation protection standards. I am enclosing a copy of an interim report just issued by the task force.

L-4-17-20

7910170 190

870 353

SEP 13 1979

Mr. David G. Hawkins

- 2 -

In view of your prominent role in matters of this kind, I plan to keep you fully informed as we move ahead on this formidable task. I welcome any ideas, suggestions, or comments you may have. Please let me know if you would like me to meet with either you or Dr. Rosenbaum to more fully explain our plans.

Sincerely,

Original signed by:  
ROBERT B. MINOGUE

Robert B. Minogue, Director  
Office of Standards Development

Enclosure:  
Copy of Interim Report

cc: w/encl.  
Dr. D. S. Fredrickson, NIH  
Mr. J. Villforth, BRH  
Mr. G. Wrenn, OSHA  
Ms. R. Clusen, DOE  
VADM. R. R. Monroe, DOD  
Mr. L. D. Santman, DOT  
Dr. D. M. Rosenbaum, EPA

DISTRIBUTION:  
Central Files  
SD rdg  
RHSS rdg  
RBMinogue  
KRGoller  
RAPurple

SD Task No. *PH 905-1*

AD/RHSS	D/SHSS	SD/D
RAPurple:bas	KRGoller	RBMinogue
9/12/79	9/ /79	9/ /79

870 354