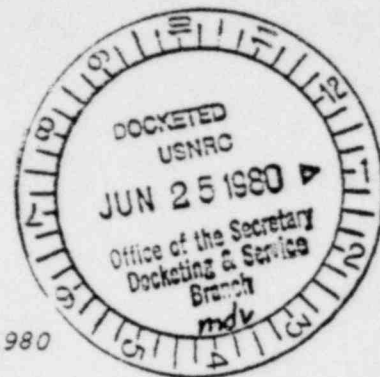




**NEW YORK  
STATE ENERGY OFFICE**

ROCKEFELLER PLAZA  
ALBANY, NEW YORK 12223  
JAMES L. LAROCCA, COMMISSIONER



DOCKET NUMBER  
PROPOSED RULE **PR-20 (64)**  
**(45 FR 18023)**

June 18, 1980

Secretary of the Commission  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Attention: Docketing and Service Branch

Dear Sir:

The NRC advance notice of proposed rulemaking, which considers a major revision to 10 CFR Part 20, has been reviewed by the cognizant New York State agencies. Based on this review, New York supports the proposed rulemaking and is pleased to note that a majority of the comments submitted by the State to the NRC staff on a preliminary draft of the advance notice have been incorporated in the published version. Several additional comments are offered for your further consideration.

Essential Elements of Radiation Protection Standards

- o Items B.(4) and C.(3) should contain a reference to soil concentration standards.
- o Item D.(7) should also include effluent monitoring.

Areas In Part 20 That Need Improvement

- o Item A.(2) should be expanded to explicitly include strengthening of requirements for public exposure.
- o Item C.(2) should be expanded to include development and incorporation of soil concentration standards.
- o Although natural radioactive material, other than source material, is exempt from NRC regulations, a reference to the U.S. EPA and OSHA regulatory responsibilities for this material should be incorporated in Part 20 for comprehensiveness.

New York appreciates being given the opportunity to comment on this proposal.

Sincerely,

*John P. DeBoer*  
T. K. DeBoer  
Director of Nuclear Operations

Forwarded by card 6/26/80.mdv

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