



PDR
AESC-1

TERRY E. BRANSTAD, GOVERNOR

DEPARTMENT OF PUBLIC HEALTH
CHRISTOPHER G. ATCHISON, DIRECTOR

August 4, 1993

Alan K. Roechlein
Office of Nuclear Regulatory Research
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Roechlein:

Reference is made to Mr. Kammerer's communique of July 29, 1993 entitled "Fast Track Rulemaking For 10 CFR 19 & 20 (SP-93-094)" and our telephone conversation on August 4, 1993. Please be advised that we have reviewed the proposed changes and only have concerns with 20.1003 as it relates to the new definition of "Public Dose" found on page 12.

Based on our interpretation of the meaning of the "Public Dose", as it appears in SP-93-094, the NRC will evaluate, during each inspection, all public exposure to ionizing radiation. For example, in a hospital they would need to not only consider exposure from radioactive material (RAM) but also from X-Ray, NARM, accelerators, etc. It is our understanding that this interpretation is not correct. In fact, what was meant was public exposure from RAM. If the word "licensed" was added in line 4 after others, it is our opinion that the confusion would be corrected.

As indicated during our conversation on August 4, 1993, we are in the middle of our rule making process to incorporate "New" Part 20 into our current regulations by the January 1, 1994 deadline. Based on our conversation it appeared that you are of the opinion that only minor changes would be made in the proposed regulation. As indicated previously, we only have the one concern and it appears that you will be taking care of it. Since we are in the rule making process, we are seriously considering incorporating the proposed changes to be effective at the same time yours are in place. Please advise us if you see major changes in the proposed regulation so we can react appropriately.

Thank you for your time and assistance.

Sincerely,

Donald A. Flater, Chief
Bureau of Radiological Health
(515)281-3478

cc: C. Kammerer, NRC HQ.