

SEP 30 1993

MEMORANDUM FOR: Eric Beckjord, Director
Office of Nuclear Regulatory Research

FROM: Joseph R. Gray, Deputy Director
Office of Enforcement

SUBJECT: PROPOSED AMENDMENTS TO 10 CFR PARTS 19 AND 20,
TO DELETE CONTROLLED AREA, REVISE THE DEFINITION
OF OCCUPATIONAL DOSE, AND TO REVISE CRITERIA ON
WHEN RADIATION PROTECTION TRAINING IS REQUIRED

This Office has reviewed the proposed rule and our previous comments submitted August 12, 1993 (Enclosure 1). We believe it is important to retain language that requires training of individuals frequenting or working in restricted areas whether or not they received any measurable exposure to radiation or radioactive materials. Based on this and for grammatical reasons we recommend that the first sentence in Section 19.12 read as follows:

"All individuals whose assigned duties in the course of employment involve entry into areas where radiation or radioactive materials are present shall be kept informed of the storage, transfer, or use of radiation and/or radioactive material;....."

We strongly recommend this language in order to capture the minimal training that we have traditionally required the licensee to provide to such individuals who frequented or worked in restricted areas.

With this addition, OE concurs in this rulemaking. We note the addition of language in 20.2205 for reports to individuals and appreciate your efforts to clarify this issue.

15/
Joseph R. Gray, Deputy Director
Office of Enforcement

Enclosure: As Stated

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