

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 offers the following comment on the change to the training requirement in 10 CFR 19.12:

Individuals such as housekeeping and maintenance personnel may frequent or work in restricted areas such as the hot laboratory of a hospital nuclear medicine department even though these individuals are not engaged in licensed activities. Their activities in the restricted area normally may not involve measurable exposure to radiation or to radioactive material. It is important to retain in the regulation the phrase "working in or frequenting any portion of a restricted area" in order to capture the minimal training that we have traditionally required the licensee to provide to such individuals.


With this addition, OE concurs in this rulemaking.


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Joseph R. Gray, Deputy Director  
Office of Enforcement

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