

PDR  
AE80-1

OCT 1 1993

NOTE TO: James E. Wigginton, NRR, OWFN 10D4  
Thomas H. Essig, NRR, OWFN 10D4  
Catherine Haney, NMSS, OWFN 6H3  
Cynthia G. Jones, NMSS, OWFN 6H3  
Dennis M. Sollenberger, OSP, 3D23  
William C. Reamer, OGC, 15B18

FROM: Alan K. Roecklein, RPHEB, DRA, RES

The enclosed markup results from NRR reaction to the second request for office concurrence, as modulated by OGC. It includes comment from OSP. I request that if your office has not yet concurred, that you base review and concurrence on this version, and that if you have concurred, that you reconsider. In any case please call me with your comments and concurrence soon.



Alan K. Roecklein  
Radiation Protection and Health  
Effects Branch  
Division of Regulatory Applications  
Office of Nuclear Regulatory Research

Enclosure:  
As stated



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555-0001

PDR cc: Cool  
Roeckler  
Dragonette  
File ( )

dm

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.

*Joseph R. Gray*  
Joseph R. Gray, Deputy Director  
Office of Enforcement

Enclosure: As Stated

*9403760114 LP*

AUG 12 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 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.

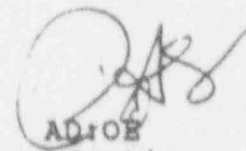
151


Joseph R. Gray, Deputy Director  
Office of Enforcement

DISTRIBUTION:

JLieberman  
JGray  
PSantiago  
JDelMedico  
Day File

OE   
JDelMedico  
08/11/93

  
AD:OE  
PSantiago  
08/11/93

  
DO:OE  
JGray  
08/11/93

Doc Name: e:\PT19.JD

9403150337

1/21