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STATE OF WASHINGTON

DEPARTMENT OF HEALTH

DIVISION OF RADIATION PROTECTION

Airdustrial Center, Bldg. 5 • P.O. Box 47827 • Olympia, Washington 98504-7827

March 2, 1994

Richard L. Bangart, Director
Office of State Programs
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dick

Dear Mr. Bangart:

This is a follow-up to the Surmeier/Blanton letter of November 17, 1993 which provided comments on our then proposed "10 CFR Part 20" regulations and my response dated November 24, 1993 which acknowledged several "unresolved" items. The unresolved items were five definitions which varied from Part 20 language. We have met with our Radiation Protection Standards Work Group (including representatives of both licensees and x-ray registrants) and have reached agreement on the following wording for the five definitions in question. Please review this wording and let us know if you have any remaining concerns.

"Member of the public" means an individual except when the individual is receiving an occupational dose.

"Occupational dose" means the dose received by an individual in the course of employment in which the individual's assigned duties involve exposure to sources of radiation, whether in the possession of the licensee, registrant, or other person. Occupational dose does not include dose received: from background radiation, as a patient from medical practices, from voluntary participation in medical research programs, or as a member of the public.

"Public dose" means the dose received by a member of the public from exposure to sources of radiation under the licensee's or registrant's control or to radioactive material released by the licensee. It does not include occupational dose, dose received from background radiation, dose received as a patient from medical practices, or dose received from voluntary participation in medical research programs.

"Unrestricted area" (uncontrolled area) means any area which is not a restricted area. Areas where the external dose exceeds 2 mrem in any one hour or where the public dose, taking into account occupancy factors, will exceed 100 mrem total effective dose equivalent in any one year must be restricted.

"Worker" means an individual engaged in activities under a license or registration issued by the department and controlled by a licensee or registrant but does not include the licensee or registrant. Where the licensee or registrant is an individual rather than one of the other legal entities defined under "person", the radiation exposure limits for the worker also apply to the



individual who is the licensee or registrant. If students of age eighteen years or older are subjected routinely to work involving radiation, then the students are considered to be workers. Individuals of less than eighteen years of age shall meet the requirements of WAC 246-221-050.

We understand that Agreement State regulations have been sent to a contractor for review. Please let us know how soon we can expect to find out if additional concerns are to be raised. It would be most economical and efficient if we could respond to all concerns in a single "editorial" revision of our regulations. Since we already have some key definition changes to make, it is important that we hear from you as soon as possible so that we can at least proceed with revising the chapter on definitions.

Thanks you for your cooperation. If there are any questions about this letter please call me at 206) 753-3461.

Sincerely,



Terry C. Frazee, Supervisor
Radioactive Materials Section