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PROPOSED RULE PR 19,20  
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April 12, 1994

Secretary, U.S. Nuclear Regulatory Commission  
Attention: Docketing and Service Branch  
Washington, D.C. 20555

Serial No. 94-085  
NL&P/GSS R0

Gentlemen:

**COMMENTS ON PROPOSED RULE**  
**RADIATION PROTECTION REQUIREMENTS:**  
**AMENDED DEFINITIONS AND CRITERIA**

In the February 3, 1994, Federal Register, the NRC requested comments on the proposed rule to amend its regulations concerning radiation protection requirements.

We have reviewed the proposed rule and the proposed comments prepared by the Nuclear Energy Institute (NEI). Based upon the results of our review, we specifically endorse NEI's comments and strongly support their request that if the NRC proceeds with the deletion of the controlled area concept, then the nuclear power industry licensees be exempt from this aspect of the rule. The suggested approach to maintain the current definition of controlled area as part of the rulemaking would provide the licensees with the continued use of the controlled area concept. This will allow the licensees to maintain an adequate level of protection of health and safety without imposing unnecessary regulatory burden.

We appreciate the opportunity to make comments on this proposed rule. If you have any questions, please contact us.

Very truly yours,

M. L. Bowling, Manager  
Nuclear Licensing and Programs

Attachment

DS16

cc: Mr. Ron Simard  
Manager, Industry Coordinator  
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