

DOCKET NUMBER  
PROPOSED RULE PR 19-20  
(59FR 5132)



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USNRC

'94 APR -6 P2:50

STATE OF ILLINOIS  
DEPARTMENT OF NUCLEAR SAFETY  
1035 OUTER PARK DRIVE  
SPRINGFIELD, IL 62704  
(217) 785-9900

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

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THOMAS W. ORTCIGER  
DIRECTOR

JIM EDGAR  
GOVERNOR

March 29, 1994

Secretary of the Commission  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Attention: Docketing and Service Branch

Re: 10 CFR Parts 19 and 20, "Radiation Protection Requirements; Amended  
Definitions and Criteria," (59 Fed. Reg. 5132-5138, February 3, 1994.)

Dear Sir:

The Illinois Department of Nuclear Safety (Department) hereby submits its comments on the referenced proposed rule. Overall, the Department agrees with the changes described in the proposed rule. The rule represents changes to the Standards for Radiation Protection that delete the term, "controlled area" and modifies the instruction to worker requirements and several definitions to reflect this change. The rule also requires licensees to transmit a report to the affected individual whenever a licensee has to report that an individual has exceeded applicable dose limits.

The Department has been an advocate of removing "controlled area" from Part 20, and in fact, our equivalent regulations to NRC's Part 20 do not include the term "controlled area." By deleting references to controlled areas, the Department had to modify its definitions of "member of the public," "occupational dose," "public dose" and "unrestricted area." We have compared your proposed definitions with the Department's current definitions for these terms, and while there are very slight differences between the two versions, we believe the terms are essentially equivalent. Therefore, the Department does not intend to modify its definitions to be identical to NRC's even though the proposed rule states that these definitions are Division I matters of compatibility.

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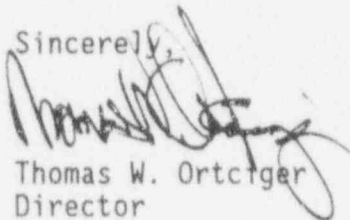
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In general, the Department is pleased with NRC's responsiveness to concerns raised by States regarding the term "controlled area," and we hope the issue of compatibility for terms with modified definitions will also be handled in a reasonable manner. If you have any questions regarding these comments, do not hesitate to call me or Kathy Allen at (217) 785-9947.

Sincerely,



Thomas W. Ortoger  
Director

TWO:gas

cc: Jim Lynch, Region III  
State Agreements Officer