

NOTATION VOTE
RESPONSE SHEET

RELEASED TO THE PDR
12/14/90
Date initials

TO: SAMUEL J. CHILK, SECRETARY OF THE COMMISSION
FROM: COMMISSIONER CURTISS
SUBJECT: SECY-90-336 - IMPLEMENTATION DATE FOR 10 CFR PART 20 REVISION

APPROVED in part DISAPPROVED in part ABSTAIN _____
NOT PARTICIPATING _____ REQUEST DISCUSSION _____

COMMENTS:

See attached comments.

9012240085 901010
PDR COMMS NRCC
CORRESPONDENCE PDR

John R. Letin
SIGNATURE

10/10/90
DATE

RELEASE VOTE

WITHHOLD VOTE

ENTERED ON "AS" YES No _____

180000

LF02
0/1

Commissioner Curtiss' comments on SECY-90-336:

In view of the complexity of the changes required by the revisions to Part 20, I believe that it is unrealistic to expect licensees to implement this regulation within 12 months of when the final guidance will become available. Indeed, in conversations with those who will be responsible for implementing this regulation during my recent plant visits, the difficulty of meeting such a deadline has been repeatedly emphasized. Beyond this, I also believe that it is important that we establish a uniform deadline for both Agreement State licensees and NRC licensees to come into compliance.

Accordingly, I approve a delay in the required implementation date for the revised Part 20 for all licensees until January 1, 1994, with the understanding that all relevant regulatory guidance documents will be complete and available in final form by December 31, 1991. The Commission should be advised of any expected delay in meeting this date for issuance of the guidance.

Finally, I do not object to staff's recommendation that NRC licensees who so desire be permitted to implement the final Part 20 in its entirety prior to January 1994, provided that the NRC is properly informed.