

## NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555

MAR 1 7 1993

PDR AF80-1

MEMORANDUM FOR:

C.J. Heltemes Jr., Deputy Director for Generic Issues and Rulemaking, Office of Nuclear

Regulatory Research

FROM:

Stuart A. Treby, Assistant General Counsel

for Rulemaking and Fuel Cycle

SUBJECT:

INTELIATION OF RULEMAKING FOR 10 CFR PART 20

In response to your March 11, 1993 memorandum on this subject, we reviewed the draft package to initiate rulemaking, proposing to delete the term "controlled area" and to revise the definition of "occupational dose" in 10 CFR Part 20. We are enclosing our comments in the form of a markup of the draft package. Subject to our suggested modifications being made, we have no legal objection to issuance of the package of initiate rulemaking.

We appreciate the opportunity to review and comment on this matter.

Stuart A. Treby

Assistant General Counsel

for Rulemaking and Fuel Cycle

Enclosure: Draft Rulemaking Package markup

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