



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

OCT 07 1993

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MEMORANDUM FOR: C. J. Heltemes, Deputy Director
for Generic Issues and Rulemaking
Office of Nuclear Regulatory Research

FROM: Frank J. Congel, Director
Division of Radiation Safety
and Safeguards
Office of Nuclear Reactor Regulation

SUBJECT: OFFICE REVIEW OF A PROPOSED RULE - RADIATION
PROTECTION REQUIREMENTS; AMENDED DEFINITIONS
AND CRITERIA (YT0930217)

I am responding to your memorandum on this subject that was addressed to Dr. Murley and was dated September 22, 1993.

On September 28, 1993, members of both NRR and RES technical staff and OGC met to discuss NRR comments on the draft rule package. Based on that meeting, your staff modified the package and, on October 1st, provided my staff with the marked-up rule change package. After a careful review of this revised draft rule, NRR concurred with the first three of the four proposed amendments: 1) deleting the definition of controlled area in 10 CFR Part 20 (but still allowing licensees to designate such areas); 2) revising the definition of occupational dose in 10 CFR Part 20; and 3) revising 10 CFR 19.12.

The proposed fourth amendment adds a requirement in 10 CFR 20.2205 to also notify an individual member of the public when the licensee is required to notify the NRC that such an individual has received a dose in excess of the Part 20 limits. Initially, we had problems with this amendment. A meeting was held on October 6, 1993, with Bill Morris, RES, and William Reamer, OGC, and cognizant members of my staff to resolve our concerns. As a result of this meeting, all parties in attendance agreed that the 10 CFR 20.2205 reporting requirement would remain in the package, but that the justification for this addition would be changed to be based on an inadvertent omission from the new 10 CFR Part 20 and would not make any reference to the 10 CFR 19.13. On the condition that this change is made, we concur in the inclusion of 10 CFR 20.2205 in the rule-change package. This concurrence does not include any additional changes to the proposed rules that have been requested by other offices and that are not included in the October 1, 1993 draft that was provided to us.

Frank J. Congel, Director
Division of Radiation Safety
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Office of Nuclear Reactor Regulation

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