NOTATION VOTE

RESPONSE SHEET RELEASED TO THE PDR 6-9-94 Pf

T0:	SAMUEL J.	CHILK,	SECRETARY O	F THE COMMISSION
FROM:	COMMISSIONER ROGERS			
SUBJECT:	SECY-93-259 - FEDERAL REGISTER NOTICE - ABNORMAL OCCURRENCE REPORTS: PROPOSED REVISION TO APPENDIX A TO POLICY STATEMENT TO INCLUDE EXAMPLES FOR REPORTING MEDICAL MISADMINISTRATIONS AS ABNORMAL OCCURRENCES AND MINOR CONFORMING CHANGES TO EXISTING ABNORMAL OCCURRENCE EXAMPLES			
APPROVED E	PART DIS	SAPPROVED	in fart	Abstain
NOT PARTICIPATING			REQUEST D	ISCUSSION
COMMENTS:		SCE ATT	ACN MENT.	
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Commissioner Rogers' Comments on SECY-93-259:

With regard to medical misadministrations, I approve Option 2. I agree with Commissioner de Planque that all of the revisions to conform the Abnormal Occurrence (AO) examples to NRC's amended 10 CFR Part 20 should be made at the same time instead of making them in two stages as the staff has proposed.

I generally agree with Commissioner de Planque's proposals for revising the AO examples involving human exposure to radiation; however, I believe that, if AO reporting were confined only to events involving exposures with a significant potential of causing harm to the exposed individual, events of possible Congressional or public interest would no longer be reported. Accordingly, I propose that the staff also develop criteria for reporting, in Appendix C of the AO reports to Congress, events involving human exposures in unrestricted areas that exceed regulatory limits, but would no longer be categorized as AOs.

Finally, I believe that AO reporting should continue to be conducted consistent with the existing Commission Policy Statement until public comments have been received and resolved on any proposed revision.

KCR 4/8/94