

## Commissioner McGaffigan's Comments on COMSECY-00-0009

I approve the staff recommendation to modify [10 CFR Part 20](#) to establish a single, unified skin dose limit that would apply to any shallow dose equivalent to the skin regardless of the source or geometry of the irradiation. I agree with Chairman Meserve and Commissioner Dicus that: 1) a contract, rather than a grant, should probably be used with the National Council on Radiation Protection and Measurements (NCRP); 2) the contract should specify milestones and a time line to ensure that this work is accomplished in a timely manner (e.g., within six months); and 3) the staff be directed to immediately proceed with developing a proposed rule in parallel with the NCRP effort so as not to further delay NRC's rulemaking on this issue. I also agree with Chairman Meserve that the Agreement States need to be engaged early in this rulemaking since they will not have had the benefit of reviewing a rulemaking plan. The staff should consider discussing its rulemaking plans with State representatives at the May 2000 meeting of the Conference of Radiation Control Program Directors.