

CHAIRMAN MESERVE'S COMMENTS ON COMSECY-00-0009

I approve the staff's proposal to request NCRP to prepare an addendum to Report No. 130 to provide the technical basis for a revision of [10 CFR Part 20](#) to achieve a unified skin dose limit. The staff should explore whether this work should be conducted as a contract to NCRP, rather than a grant. Based on the information provided by the staff, the anticipated time and effort should be significantly less than described in [COMSECY-00-0009](#). Therefore, the addendum should be requested 6 months from the date of issuance of the contract.

Furthermore, I agree with the staff's proposal to amend Part 20 to reflect the anticipated NCRP recommendations. I do not believe that a rulemaking plan is necessary. The staff should proceed to develop a proposed rule in parallel with the preparation of the addendum to Report No. 130 by NCRP. Because the States would have to adopt an identical regulation revision, the draft proposed rule should be coordinated with the Agreement States before being provided to the Commission.