



SECRETARY

UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

March 16, 2000

Action: Collins, NRR

Cys: Travers  
Paperiello  
Miraglia  
Norry  
Blaha  
Lohaus, SP  
Kane, NMSS  
Shelton, CIO  
Meyer, ADM  
Schroll, SECY  
Roecklein, NRR

MEMORANDUM TO: William D. Travers  
Executive Director for Operations

FROM: Annette L. Vietti-Cook, Secretary *Annette Vietti-Cook*

SUBJECT: STAFF REQUIREMENTS - COMSECY-00-0009 - RULEMAKING  
ON DISCRETE RADIOACTIVE PARTICLE DOSE CONSTRAINT

The Commission has approved the staff's recommendation to initiate rulemaking that would 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, as described in COMSECY-00-0009, subject to the following comments.

The staff should contract with the National Council on Radiation Protection and Measurements (NCRP) to provide technical justification for this regulatory action, by means other than a grant, to ensure that the needed technical support is completed in a timely manner. The proposed NCRP work should be completed within six months from the date of issuance of a contract, purchase order, or other appropriate method. There is no reason for the staff to develop and provide a formal rulemaking plan to the Commission. The staff should proceed to develop a proposed rule in parallel with the work that will be performed by NCRP. The staff should coordinate the draft proposed rule with the Agreement States before providing it to the Commission. The staff should consider discussing its rulemaking plans with State representatives at the May 2000 meeting of the Conference of Radiation Control Program Directors.

(EDO) (NRR)

(SECY Suspense: 6/15/04)  
6/8/01

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Before release of COMSECY-00-0009 to the public document room, the statement on page 2 regarding "authoritative recommendations from NCRP" should be revised to state:

*"The staff believes that changing this fundamental definition of shallow dose equivalent would be strengthened with formal, authoritative recommendations from the NCRP."*

cc: Chairman Meserve  
Commissioner Dicus  
Commissioner Diaz  
Commissioner McGaffigan  
Commissioner Merrifield  
OGC  
CIO  
CFO  
OCA  
OIG