

IN RESPONSE, PLEASE  
REFER TO: M020320A

March 20, 2002

MEMORANDUM FOR: William D. Travers  
Executive Director for Operations

FROM: Annette L. Vietti-Cook, Secretary /RA/

SUBJECT: STAFF REQUIREMENTS - AFFIRMATION SESSION, 9:25 A.M.,  
WEDNESDAY, MARCH 20, 2002, COMMISSIONERS'  
CONFERENCE ROOM, ONE WHITE FLINT NORTH,  
ROCKVILLE, MARYLAND (OPEN TO PUBLIC ATTENDANCE)

I. SECY-02-0021 - FINAL RULE ON REVISION OF THE SKIN DOSE LIMIT, 10 CFR  
PART 20

The Commission approved a final rule which revises the skin dose limit in 10 CFR Part 20, subject to the changes in the attachment. The final rule changes the definition and method of calculating shallow-dose equivalents (SDEs) by specifying that the assigned SDE must be the dose averaged over the 10 contiguous square centimeters of skin receiving the highest exposure, rather than 1 square centimeter as stated in the existing regulation. In addition, the rule change would clarify that the SDE is the dose limit to the skin of any extremity, as well as the skin of the whole body.

Following incorporation of these changes, the Federal Register notice should be reviewed by the Rules Review and Directives Branch in the Office of Administration and forwarded to the Office of the Secretary for signature and publication.

(EDO)

(SECY Suspense:

4/03/02)

Attachment:  
As stated

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

OPA  
Office Directors, Regions, ACRS, ACNW, ASLBP (via E-Mail)  
PDR

**Changes to Federal Register Notice in SECY-02-0021**

General Comment:

The Summary, and other sections of the FRN, as appropriate, should be expanded to include a brief layman's explanation of why a less restrictive regulation that changes the definition and method of calculating the dose to the skin and extremities will not only provide adequate protection of workers, but be an improvement, e.g., the rulemaking would reduce the whole-body exposures and nonradiological health risks, such as heat stress, to workers.

Specific changes:

1. Page 2, change last line to read: "... areas of the skin, **but the stochastic risk of inducing skin cancer due to a DRP exposure is negligible.**"
2. Page 3, line 4: delete comma following "Although"
3. Page 3, change lines 6 and 7 to read: "... insignificant **overall** health detriments. Nevertheless, under existing provisions in NRC regulations, several of these contamination events ~~resulted in~~ **were defined as** overexposures, and **resulted in** ~~subsequent~~ enforcement ..."
4. Page 3, second paragraph, line 6: delete superscript 1 and corresponding footnote at the bottom of the page.
5. Page 4, line 11, change "SDE" to "SDEs"
6. Page 4, second paragraph, change line 7 to read: "... existing limit of 50 rem **(0.5 Sv)** ..."
7. Page 7, second full paragraph, line 9: delete unnecessary line break following "increases to"
8. Page 8, first full paragraph, line 4: delete superscript 2 and corresponding footnote at the bottom of the page.
9. Page 8, first full paragraph, change line 9 to read: "... limit of 50 rem (0.5 Sv) ~~of~~ SDE averaged ..."
10. Page 9, second full paragraph, change lines 2 and 3 to read: "... commented that ~~they are~~ **it is** in favor of the proposed revision of the skin dose limit and agrees ~~s~~ with... "
11. Page 10, change line 5 to read: "... of the eye dose **than the current limit**, would establish a skin..."
12. Page 10, first full paragraph, change line 2 to read: "... limits to 5 rem **(50 mSv)** in a ..."

13. Page 11, first full paragraph, lines 2 and 3, change first letter of words to lower case: “~~E~~ffective-dose” and “~~D~~deep-dose”
14. Page 13, second paragraph, change line 1 and 2 to read: “... ~~Note that~~ **Although** the NCRP recommended limiting the dose from DRPs in the ear and on the eye, ~~the~~ **the** NRC ...”
15. Page 15, second paragraph, add commas to lines 2 and 3: “... observable, though transient, deterministic ...”
16. Page 16, change line 1 to read: “A final geometry of interest is ~~the case of~~ **that where** DRPs **are** on or ...”
17. Page 17, line 4: change footnote number to 1 and then transpose superscript 1 and the adjacent comma to read: “... DRPs,<sup>1</sup> ...” This should also correct the footnote number at the bottom of the page.
18. Page 17, first full paragraph, change line 1 to read: “~~The~~ **NRC's** Radiation Exposure Information Reporting System (REIRS) database ...”
19. Page 17, second full paragraph, change line 2 to read: “... effects, but ~~this tradeoff~~ **nonetheless** represents a...”
20. Page 23, first full paragraph, change line 8 to read: “... expected to ~~substantially~~ increase industrial safety for workers **substantially**.”