

**NOTATION VOTE**

**RESPONSE SHEET**

TO: Annette Vietti-Cook, Secretary

FROM: Gregory B. Jaczko

SUBJECT: SECY-12-0064 – RECOMMENDATIONS FOR POLICY  
AND TECHNICAL DIRECTION TO REVISE RADIATION  
PROTECTION REGULATIONS AND GUIDANCE

Approved   X   Disapproved        Abstain       

Not Participating       

COMMENTS: Below        Attached   X   None       

  
\_\_\_\_\_  
SIGNATURE

6/20/12  
DATE

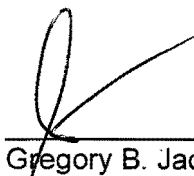
Entered on "STARS" Yes   X   No

**Chairman Jaczko's Comments on SECY-12-0064,  
"Recommendations for Policy and Technical Direction to Revise Radiation Protection  
Regulations and Guidance"**

I approve the staff's recommended Option 3, to develop the regulatory basis for greater alignment of 10 CFR Part 20 dosimetry and limits, and parallel alignment of 10 CFR part 50, appendix I. This regulatory basis will likely provide a substantial increase in overall protection of public health and safety for workers and members of the public. I commend the staff in their considerable efforts to engage with a variety of professional societies, licensee organizations, and public interest groups.

I believe Option 3 provides the best approach for improving our regulations to provide better assurance of protection and will make these changes applicable to our licensees in a consistent and complete manner. I support the staff's ongoing efforts to obtain dose data from a wide range of licensees in order to better inform the regulatory basis and to better understand the potential regulatory options. I also support the staff's efforts to explore the merits of the use of SI units. I do not support Option 1, the status quo, because I believe that the NRC's radiation protection standards should be updated to reflect developments in scientific knowledge, and include consideration of the detriment arising from all of the effects of radiation on health. The significant changes in radiation risk estimates and the methodologies for recommending dose limits since the 1991 revision to NRC's radiation protection regulations lead me to agree with the staff's conclusions that there is a sufficient scientific basis to amend the NRC's regulatory framework.

The staff should develop the comprehensive regulatory basis in Option 3 in a focused and committed manner in order to complete the regulatory revisions in a timely manner, before the next update to the ICRP recommendations. I am concerned that the effort could continually be a low-priority, receiving enough resources to continue working but never enough to finish the effort. If we are going to embark in this revision, we should be resolute in our commitment to complete it. Once the dose conversion factors are developed, the staff should work towards making this rule effective within five years.

  
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Gregory B. Jaczko

6/25/12  
\_\_\_\_\_  
Date