

**NIST**

50-184

UNITED STATES DEPARTMENT OF COMMERCE
National Institute of Standards and Technology
Gaithersburg, Maryland 20899-0001

June 30, 1994

Seymour H. Weiss
Director, Non-Power Reactors and Decommissioning
Project Directorate
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Dear Dr. Weiss:

Thank you for your letter of June 3, 1994. We have carefully reviewed the questions and answers you enclosed in your letter. I have also discussed the positions outlined therein with others outside. We still believe that these positions have no basis in logic or regulations and are contrary to sound radiation protection practices. I wish to emphasize that there is no question about the basic objective of keeping exposures below regulatory limits and as low as reasonably achievable. There is an absolute commitment to that. Imposing controls not designed nor intended for small beams will not achieve this objective and could be counter productive. We are preparing detailed responses to the questions and answers at which time we would like to meet with you to discuss them further. In general, the issues addressed in the "Questions and Answers" are not relevant to the essential question of proper protective measures for small radiation beams used in research.

Sincerely,

Tawfik M. Raby
Chief, Reactor Operations and Engineering