



TERRY E. BRANSTAD, GOVERNOR

96 OCT 16 AL 31 DEPARTMENT OF PUBLIC HEALTH
CHRISTOPHER G. ATCHISON, DIRECTOR

September 9, 1996

Joseph DelMedico
Office of Nuclear Regulatory Research
US Nuclear Regulatory Commission
Washington, DC 20555-0001

OFFICE
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DOCKET NUMBER PR 20
PROPOSED RULE
(617R 3334) 88

Subject: RESPONSE TO TRANSMITTAL OF AGREEMENT STATES
PROGRAM INFORMATION (SP-96-093)

Dear Mr. DelMedico:

As requested in the subject Transmittal Letter dated August 22, 1996, the Iowa Department of Public Health (IDPH), Bureau of Radiological Health, agrees with the proposed rule that addresses reporting of unauthorized use of radioactive material. However, the analysis warrants two comments.

IDPH disagrees with the impact analysis. Although the proposed rule addresses the unauthorized use of radioactive material, many of the Agreement States can be expected to implement the reporting requirement for unauthorized use of any source of radiation. Agreement States having regulatory responsibility for machine-produced radiation and NARM will, in all likelihood, experience twice the estimated number of reportable events.

The discussion concerning the proposed rule does not address the response anticipated by the NRC. Agreement States must retain the ability to evaluate each reportable event and respond as they deem appropriate.

If you have any questions concerning this response, please contact George F. Johns, Jr. at (515) 242-6280 or me.

Sincerely,

Donald A. Flater, Chief
Bureau of Radiological Health
(515) 281-3478

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4-1 Proposed Rule

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