

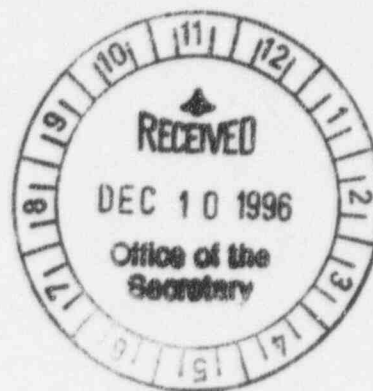


DSI-12  
27A  
Council on Radionuclides and Radiopharmaceuticals, Inc.

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Henry H. Kramer, Ph.D.  
Executive Director

December 2, 1996



Mr. John C. Hoyle  
Secretary of the Commission  
U.S. Nuclear Regulatory Commission  
Attn: Chief of Docketing Service Branch  
Washington, D.C. 20555-0001

Dear Mr. Hoyle:

On Wednesday, November 27<sup>th</sup>, I sent you comments submitted by The Council on Radionuclides and Radiopharmaceuticals (CORAR) regarding the U.S. Nuclear Regulatory Commission Strategic Assessment and Rebaselining Initiative.

Unfortunately, we did not notice that page 4 was missing from the Addendum to Attachment V: *The CORAR Position Paper on the Need to Establish an Independent Federal Agency to Set Radiation Protection Standards*.

Please insert page 4 into its correct location, and kindly accept our apologies for this omission.

Sincerely,

Roy Brown  
Chairman,  
Council on Radionuclides and Radiopharmaceuticals

RB:jf  
Attachment

13. State regulatory agencies that do not accept device and source evaluations of another State or do not provide reciprocal qualifications for operations at temporary job sites also causes unnecessary competitive disadvantages.

## CORAR RECOMMENDATIONS

In the U.S., we need to have identical radiation standards and uniform regulations concerning all interstate activities and all activities where non-uniform regulations can substantially increase cost and decrease safety.

To avoid duplicate regulations there needs to be either one regulatory agency or clear demarcation of regulatory authority. As a temporary expediency, Congress should mandate that users subject to the regulations of one agency are automatically exempt from similar regulations from another agency.

To achieve these objectives the regulatory framework needs to be restructured. The regulatory development process needs to be drastically simplified to be less wasteful of resources and to promote public and user understanding and participation.

CORAR recommends that federal agencies be separately empowered to either set radiation standards or promulgate radiation regulations in the following organization structure:

1. NCRP: Conducts and reviews scientific studies, etc., and makes radiation protection recommendations compatible with international standards.
2. FEDERAL RADIATION STANDARD SETTING AGENCY:  
Commissions and funds NCRP etc. projects. Reviews NCRP and other recommendations and provides guidance to agencies on radiation standards compatible with international standards.
3. FEDERAL REGULATORY AGENCIES: Promulgates regulations to implement federal standards. Licenses and inspects users and enforces regulations.
4. STATE REGULATORY AGENCIES: Implements federal regulations in all interstate commerce.