



CONFERENCE OF RADIATION CONTROL PROGRAM DIRECTORS, INC.

74 Fountain Place, Frankfort, Kentucky 40601

October 26, 1984

Nunzio Palladino, NRC Commissioner
U.S. Nuclear Regulatory Commission
1717 H Street, N.W.
Washington, D.C. 20555

Chairman Palladino:

The Conference of Radiation Control Program Directors, Inc., which represents all State Radiation Control Programs, including Agreement and Non-Agreement States, understands that the Commission may take action on the proposed revision of 10 CFR Part 35 in the near future.

Although the Agreement States support the revision of the regulations, it should be made clear that it is felt that significant problems are prevalent with the proposed Alternative 2. Specifically, the prelicensing review of radiation safety procedures and the changes to procedures are necessary in our view to ensure a proper degree of safety. In addition, it is felt that permitting licensees to make changes to procedures without prior approval is an unwarranted relaxation of regulatory control.

This difference of professional opinion has been brought to the attention of the NRC Task Force by way of comments on many occasions over the past two years. With one known recent exception, it has not been apparent whether the NRC Task Force is listening to Agreement State concerns or is merely in silent disagreement.

Should further hearings be held regarding the revision of 10 CFR Part 35, the Conference of Radiation Control Program Directors would appreciate the opportunity to provide testimony on this issue for the Commission's consideration.

Sincerely,

Maury Neuweg
Maury Neuweg, Chairman
Conference of Radiation
Control Program Directors,
Inc.

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