

July 1, 2004

Mr. Ron Fraass  
Executive Director  
Conference of Radiation Control  
Program Directors, Inc.  
205 Capital Avenue  
Frankfort, KY 40601

Dear Mr. Fraass:

We have reviewed the final revisions to Part D "Standards for the Protection Against Radiation" and Part A "General Provisions" of the Suggested State Regulations for the Control of Radiation (SSRCR). The final draft of these SSRCR was received by this office on May 28, 2004. The regulations were reviewed by comparison to the equivalent NRC regulations in 10 CFR Section 20. We discussed our review of these SSRCR with Shawn Seeley, Chair of the SSRCR Part D committee electronically via e-mail on June 30, 2004.

As a result of our review, we have no comments and six editorial suggestions. Please provide an amended final version of your rules, showing the location of any changes made, in response to our comments. If there are any comments which you believe are in error, please identify the section of your regulations that meet the designated compatibility category. Please note that we have limited our review to regulations required for compatibility and/or health and safety. We have determined that if these regulations are adopted, incorporating our comments and without significant change, they would meet the compatibility and health and safety categories established in the Office of State and Tribal Programs (STP) Procedure [SA-200](#).

If you have any questions regarding the comments, the compatibility and health categories, or any of the NRC regulations used in the review, please contact me or Aaron McCraw at (301) 415-1277 or [ATM@NRC.GOV](mailto:ATM@NRC.GOV).

Sincerely,

***IRA By J.M. Piccone\***

Josephine M. Piccone, Deputy Director  
Office of State and Tribal Programs

Enclosures:  
As stated

cc: Shawn W. Seeley, Chair  
CRCPD

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CRCPD

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## Editorial Suggestions

1. In A.2, the definition of “Calendar quarter,” there is an extra period at the end of the sentence.
2. In A.2 in the definition of “shallow dose equivalent,” the “to” before “the skin of an extremity” should be deleted.
3. In D.1201c., the clause with “and shallow dose equivalent” in the first sentence is no longer necessary with the addition of the second sentence.
4. In D.1201c., the hyphen in “shallow-dose equivalent” should be removed for consistency in spelling to other occurrences of the word.
5. In D.1301c.ii., the word “that” should be inserted after the word “visit” for grammatical clarity.
6. In D.1703b.ii., with the addition of Footnote “a,” the last sentence of the paragraph repeats the footnote verbatim. Either the footnote or the last sentence should be removed. If the footnote is kept in the paragraph, the reference to limits for the embryo-fetus should be corrected to D.1208. Currently it is incorrectly referencing D.2208.