

**2003
RATIONALE FOR REVISIONS**

**PART A
GENERAL PROVISIONS**

Introduction

The Nuclear Regulatory Commission continues to revise its Standards for Protection Against Ionizing Radiation found in 10 CFR Part 20. The revisions incorporated in Part A of the *Suggested State Regulations for Control of Radiation* are as follows:

Compatibility Requirements

The revisions to Part 20 were published in the following Federal Register notices:

- 1: On July 13, 1995 (60 FR 36038) and became effective on August 15, 1995.
- 2: On January 29, 1997 (62 FR 4120) and became effective May 29, 1997.
- 3: On July 23, 1998 (63 FR 39477) and became effective October 26, 1998.
- 4: On October 7, 1999 (64 FR 54543) and became effective February 4, 2000.

The Nuclear Regulatory Commission considers the adoption of these regulations a matter of compatibility for all Agreement States. Compatibility designations are noted as a separate attachment to the draft Parts A, D, & J.

Other editorial changes consistent with the Conference of Radiation Control Program Directors, Inc., *Policies and Procedures for the Preparation and Publication of the Suggested State Regulations for Control of Radiation* will not specifically be noted in the rationale discussion for each section.

Specific Provisions

Sec. A.2 - Definitions.

“Background radiation” (revised). This definition has been revised to be consistent with the definition in the revised 10 CFR Part 20. It also has been revised to exclude Technologically Enhanced Naturally Occurring Materials (TENORM) from being considered in background radiation.

“Entrance or access point” (revised). This definition is consistent with the definition in the revised 10 CFR Part 20.

“High radiation area” (revised). This definition is consistent with the definition in the revised 10 CFR Part 20.

“Lens dose equivalent” (revised). This definition is consistent with the definition in the revised 10 CFR Part 20.

“Licensing state” (revised). This definition of licensing state was revised for additional clarification and had been recommended in the 1995 Matters for Future Consideration.

“Individual monitoring devices” (revised). This definition is consistent with the definition in the revised 10 CFR Part 20.

“Occupational dose” (revised). This definition is consistent with the definition in the revised 10 CFR Part 20.

"Public dose" (revised). This definition is consistent with the definition in the revised 10 CFR Part 20.

"Radiation safety officer" (revised). This definition of radiation safety officer was revised for additional clarification and had been recommended in the 1995 Matters for Future Consideration.

“Sealed source and device registry” new definition, a recommendation from the Part G working group

"Year" (revised). This definition of year was revised for additional clarification and had been recommended in the 1995 Matters for Future Consideration.

The following definitions are being added as a result of the new regulations found in Part D entitled “Respirator Protection and Controls to Restrict Internal Exposures,” (64 FR 54543, October 7, 1999 and 64 FR 55524, October 13, 1999), effective February 2, 2000:

“Air Purifying Respirator”; “Assigned Protection Factor”; “Atmosphere Supplying Respirator”; “Class”; “Demand Respirator”; Disposable Respirator”; “Fit Factor”; “Fit Test”; “Filtering Facepiece”; “Helmet”; “Hood”; “Loose Fitting Facepiece”; “Negative Pressure Respirator”; “Positive Pressure Respirator”; “Pressure Demand Respirator”; “Qualitative Fit Test”; “Quantitative Fit Test”; Self Contained Breathing Apparatus”; “Supplied Air Respirator”; “Tight Fitting Facepiece”; and “User Seal Check.”

Matters for Future Consideration

1. Presently, the Food and Drug Administration is considering replacing "exposure" with the term "air kerma" in the diagnostic x-ray system performance standard (21 CFR, Subchapter J). Air kerma is currently in use by the National Council on Radiation Protection and Measurements and international organizations. The Suggested State Regulations should be amended when the federal definition is amended.
2. The Working Group recommended that the definition of "waste" be referred to the Working Group for Part M to consider inclusion of NARM and NORM waste.

3. When Part U has been approved, the Working Group will revise the definition of "byproduct material."
4. The Working Group has decided to consider the following changes during 1994:

"Exposure" means either:*

the quotient of dQ divided by dm where " dQ " is the absolute value of the total charge of the ions of one sign produced in air when all the electrons (negatrons and positrons) liberated by photons in a volume element of air having mass " dm " are completely stopped in air. (See A.14 for the SI unit coulomb per kilogram (C/kg) and the special unit roentgen (R).); or

irradiation by ionizing radiation or radioactive material.

* The context makes clear which is the appropriate definition.
5. The Working Group will consider new definitions for the following:
industrial radiography,
qualified expert (e.g., Mammography Quality Standards Act of 1992 and American Association of Physicists in Medicine),
worker,
manufacturing
distribution
commercial distribution
processing
6. The Working Group is considering the consolidation of the Qualified Expert definitions in various Parts into Part A.
7. The Working Group will consider input from other SR workgroups to create an all encompassing document for all definitions found in the SSRCS's. This will enable a licensee to only have to go to one location to find a definition.
8. The working group will look at intravascular depending upon Part G requirements