



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

(FSME-11-049, June, Other, Comment on IAEA Revised Schedule III, Dose to Lens of Eye)

June 3, 2011

ALL AGREEMENT STATES, MICHIGAN

OPPORTUNITY TO COMMENT ON INTERNATIONAL ATOMIC ENERGY AGENCY REVISED SCHEDULE III OF THE INTERNATIONAL BASIC SAFETY STANDARDS ADDRESSING THE SPECIFIC QUESTION OF INCORPORATION OF THE NEW INTERNATIONAL COMMISSION ON RADIOLOGICAL PROTECTION RECOMMENDATIONS FOR LIMITATION OF DOSE TO LENS OF THE EYE. **(FSME-11-049)**

Purpose: To provide the Agreement States an opportunity to comment on the International Atomic Energy Agency (IAEA) revised Schedule III of the Basic Safety Standards (BSS) addressing the specific question of incorporation of the International Commission on Radiological Protection (ICRP) recommendations for limitation of dose to lens of the eye.

Background: 1. Notice of Availability of Schedule III of the International Basic Safety Standards for Protection against Ionizing Radiation and for the Safety of Radiation Sources (the BSS) (DS379)
2. Explanatory Note on Schedule III

Discussion: IAEA has provided Schedule III of the BSS for the short Member State review on the specific question of incorporation of the new ICRP recommendations for limitation of dose to lens of the eye. This is known to be a potential issue with some medical procedures, including interventional radiology and interventional cardiology. No other portions of the BSS are open for comment, as the remainder of the requirements was endorsed by the IAEA Commission on Safety Standards on May 26, 2011.

U.S. Nuclear Regulatory Commission (NRC) is seeking comment on the proposed changes to Schedule III. Comments from the United States Government, and other Member States and International Organizations will be considered by the IAEA. We regret the short comment period, however, we would appreciate receiving your comments by June 21, 2011. This brief comment period is limited to the international standards context. The question of incorporation into U.S. regulatory requirements will be added to the NRC ongoing consideration of possible changes to 10 CFR Part 20. Please send your comments to the contact individual listed below.

*This information request has been approved by OMB 3150-0029, expiration 11/30/2013. The estimated burden per response to comply with this voluntary collection is approximately 8 hours. Send comments regarding the burden estimate to the Records and FOIA/Privacy Services Branch (T-5F52), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by Internet e-mail to_infocollects@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202 (3150-0029), Office of Management and Budget, Washington, DC 20503. If a means used to impose an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

If you have any questions regarding this communication, please contact me at 301-415-3340, or the individual named below.

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/RA/ by James G. Luehman for

Terrence Reis, Acting Director
Division of Materials Safety
and State Agreements
Office of Federal and State Materials
and Environmental Management Programs

Enclosures:

1. Notice of Availability of Schedule III of the International BSS for Protection against Ionizing Radiation and for the Safety of Radiation Sources (the BSS) (DS379)
2. Explanatory Note on Schedule III



Atoms for Peace

الوكالة الدولية للطاقة الذرية

国际原子能机构

International Atomic Energy Agency

Agence internationale de l'énergie atomique

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The Secretariat of the International Atomic Energy Agency (IAEA) presents its compliments to the Ministries of Foreign Affairs of its Member States and has the honour to request that they draw the attention of the appropriate governmental authorities to the following:

***Schedule III of the
International Basic Safety Standards
for Protection against Ionizing Radiation
and for the Safety of Radiation Sources (the BSS)
(DS379)***

Member States and their experts are hereby provided with an opportunity to review and evaluate this document available at:

<http://www-ns.iaea.org/standards/documents/draft-ms-posted.asp>

A hard copy of the document will be sent out upon request.

Any proposed changes to this draft resulting from the review by Member States will be taken into account in the finalization of the publication.

Comments on the draft should be provided in accordance with the guidance given in the attached Explanatory Note.

The Secretariat of the International Atomic Energy Agency (IAEA) avails itself of this opportunity of assuring the Ministries of Foreign Affairs of its Member States of its highest consideration.



2011-06-02

Enclosures: Explanatory Note
Statement by the Commission on Safety Standards
Process Flow

Explanatory Note
Schedule III of the
International Basic Safety Standards for Protection against Ionizing Radiation
and for the Safety of Radiation Sources (DS379)

The International Basic Safety Standards for Protection against Ionizing Radiation and for the Safety of Radiation Sources (the BSS) has been revised. In line with IAEA General Conference Resolution GC(50)/RES/10 (2006), a BSS Secretariat made up of representatives of all cosponsoring organizations and potential cosponsoring organizations (EC, FAO, ILO, NEA/OECD, PAHO, UNEP, WHO, ICRP) have been closely involved in the revision process. Since January 2007 more than 50 meetings have taken place which includes drafting meetings, BSS Secretariat meetings, meetings held by the cosponsors to obtain feedback from their expert groups, and technical meetings.

After review of the draft BSS by Member States in early 2010 and its approval by the IAEA Safety Standards Committees in November-December 2010, the Commission on Safety Standards (CSS) on 26 May 2011 endorsed the draft 5.0 of the BSS. A copy of the endorsed draft 5.0 is available at the following address:

<http://www-ns.iaea.org/committees/bss/default.asp?fd=1035>

On 21 April 2011, the International Commission on Radiological Protection (ICRP) issued an important Statement on Tissue Reactions which recommends a reduction in the dose limit (equivalent dose) for the lens of the eye. The ICRP now recommends an equivalent dose limit for workers for the lens of the eye of 20 mSv in a year, averaged over defined periods of 5 years, with no single year exceeding 50 mSv. Previously this dose limit was 150 mSv per year. Further details can be found in the ICRP Statement at the following address:

<http://www.icrp.org/docs/ICRP%20Statement%20on%20Tissue%20Reactions.pdf>

The CSS intends to incorporate the revised dose limit for the equivalent dose to the lens of the eye into Schedule III of the BSS before its submission to the IAEA Board of Governors. The revised dose limits are highlighted in bold characters in Schedule III.

Member States are invited to provide comment on the revised Schedule III by 7 July 2011. Any comments, which should be made in English, should be sent through the official channels to the IAEA technical officer, Ms Renate Czarwinski of the Division of Radiation, Transport and Waste Safety. Ms Czarwinski may be contacted for further information in connection with this subject at (0043)-1-2600-22721 or through email at r.czarwinski@iaea.org.

Statement by the Commission on Safety Standards

The IAEA's safety standards are prepared and reviewed in accordance with a uniform process. To this end, the Commission on Safety Standards and four Committees (NUSSC, RASSC, WASSC and TRANSSC) with harmonized terms of reference were established in 1996. The Commission has a special overview role with regard to the Agency's safety standards and provides advice to the Director General on the overall programme on regulatory aspects of safety.

The uniform preparation and review process involves: organizing expert group meetings; arranging at different stages of preparation for the internal review of draft texts; submitting documents to the relevant Committee(s) for review; submitting draft texts to the Agency's Member States for comment; planning and coordination to facilitate the co-sponsoring of safety standards and submitting the final edited draft of the safety standards¹ for endorsement by the Commission before publication (see attached flow chart).

The Commission on Safety Standards stresses the importance of Member States' comments to the preparation and review process for safety standards. The IAEA's safety standards should not only be of the requisite quality but should represent the consensus view of the Member States and should address the issues of importance to the Member States. While the Commission, the Committees and the Secretariat strive to provide safety standards that satisfy these criteria, the review of draft standards in the Member States is an essential stage in obtaining the broadest possible technical consensus and the highest possible quality and relevance.

Member States are also encouraged to provide the IAEA with feedback on the use of the published safety standards. The full text of recent safety standards and the status of safety standards in preparation are posted on the IAEA's Web site [<http://www-ns.iaea.org/standards/>]. The IAEA technical officer, Mr. D. Delattre, Head of the Safety Standards and Application Unit of the Department of Nuclear Safety and Security, may be contacted for further information in connection with this subject at (0043)-1-2600-22696 or through email at d.delattre@iaea.org.

¹ Safety Guides are published under the authority of the Director General. Safety Fundamentals and Safety Requirements publications require the approval of the Board of Governors, after endorsement by the Commission.

PROCESS FLOW

