



American Association for Nuclear Cardiology, Inc.

Professionals Dedicated to Diagnostic Accuracy

20 June 2000

Fax: 301-415-5369
US Mail

Mr. Donald A. Cool, Director
Division of Industrial and Medical Nuclear Safety
US Nuclear Regulatory Commission
Washington, DC 20555

301-415-7197

Dear Mr. Cool,

It has been called to our attention that in some instances there may be a difference between the radiation safety regulations of federal, state or local agencies. The differences may be administrative, different reporting/record keeping and/or may be value based, different levels of permissible radiation.

It is our position that one must obey all regulations and where a conflict exists, meet the most stringent of the requirements. This thus requires that one may have to meet a requirement that is more stringent than is required by one agency to address the requirements of another agency. In addition, it is expected that an approval by one agency does not guarantee approval by another agency who has a more stringent regulation.

For example, if one agency permits an occupational dose of 5.0 rem per year and another agency permits 1.25 rem per quarter, the annual amounts are the same but the rate at which it can be obtained is different. The same could be applied to exposure levels and leak/wipe tests.

Please confirm, in writing, that our position is valid or please point out the error in our conclusion. We will thus notify our members of this issue.

Sincerely,

Charles H. Rose, MA, MSPH, D(ABSNM)
Executive Director