



American Association for Nuclear Cardiology, Inc.

Professionals Dedicated to Diagnostic Accuracy

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20 June 2000

Mr. John W. Hickey
US Nuclear Regulatory Commission
Materials Safety and Inspection Branch
IMNS, NMSS
Washington, DC 20555-0001

Dear Mr. Hickey,

Federal Regulations require a quarterly measurement of the occupational radiation dose records of all personnel working with by product material (10CFR35.22(b)(4)). It appears to us that it would not be possible to perform such a review if the records are obtained on a bimonthly basis (every two (2) months).

If a quarterly review is held, as required by law, the first quarter, only one (1) dosimeter reading would be available, that of January - February. The second quarter, one (1) reading would be available, March - April, but the third quarter May - June and July - August would be available. The fourth quarter only September - October would be available. The November - December exposure would not be reviewed until the first quarter of the following year, in March, along with the January - February readings.

To not review dosimetry reports for four (4) months, i.e. the first quarter of the year and is inappropriate, poor radiation safety and, in our opinion, does not address the intent of the requirement for a quarterly review. Please advise us as to your position on the use of personnel dosimeters that have a two (2) month duration.

Sincerely,

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

RECEIVED DATE: 06/27/00 - YR
SIGNED TO: JXD
AND DUE DATE: 07/23/00