

August 2, 2000

Mr. Charles H. Rose
Executive Director
American Association of Nuclear Cardiology, Inc.
5660 Airport Boulevard, Suite 101
Boulder, Colorado 80301

Dear Mr. Rose:

I am responding to your June 20, 2000, letter in which you expressed concerns about the requirements for quarterly review of occupational radiation dose records by a medical Radiation Safety Committee (RSC), and the use of bimonthly personnel dosimetry which measures dose in two-month increments.

The requirement of 10 CFR 35.22(b)(4) specifies that the RSC must review quarterly, with the assistance of the Radiation Safety Officer, a summary of the occupational radiation dose records of all personnel working with byproduct material. This regulation does not require that the summary review cover a specific period. Therefore, the use of two-month dosimetry does not conflict with 35.22(b)(4).

You expressed concern that use of two-month dosimetry could in some cases result in an unacceptable four-month delay before summary dosimeter records are reviewed by the RSC. As specified in 10 CFR 20.1502, licensees are required to monitor exposures at levels sufficient to demonstrate compliance with the dose limits in 10 CFR Part 20, regardless of the specific scheduling of RSC meetings. Licensees are expected to promptly review dose reports as necessary to assure compliance with these requirements.

I hope this reply responds to your concern.

Sincerely,

/RA/

John W. N. Hickey, Chief
Materials Safety and Inspection Branch
Division of Industrial and
Medical Nuclear Safety
Office of Nuclear Material Safety
and Safeguards

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See previous concurrence

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