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MONTEFIORE



February 28, 2001

Rules and Directives Branch
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Re: Regulatory Guide 10.8
Guide for the Preparation and Applications for Medical Use Programs
Appendix G, Table 1

Dear Sirs:

Table 1 in Appendix G of Regulatory Guide 10.8 contains Investigational Levels (mrem per calendar quarter) for occupational external doses which initiate review or investigation by the RSO.

TABLE 1

	Investigational Levels (mrem per calendar quarter)	
	<u>Level I</u>	<u>Level II</u>
1. Whole body; head and trunk; active blood-forming organs; lens of eye; or gonads	125	375
2. Hands and forearms; feet and ankles	1875	5625
3. Skin of whole body	750	2250

This table is also incorporated in Table G-1 in License Guide 10.8 (Revision 2, December 1997), "Guide for the Preparation of Applications for Medical Programs", issued by the Bureau for Radiological Health, New York City Department of Health.

The wording of these three categories and the indicated levels seem to be based on outdated annual dose levels (see NCRP Report No. 33, Appendix B, Table 1, issued February 1, 1968 [out of date]).

The old NCRP table uses the same wording as Table 1, containing the following annual dose limits:

	<u>Maximum yearly dose (rem)</u>
1. Whole body; head and trunk; active blood-forming organs; lens of eye; or gonads	5 [with accumulated dose 5(N-18)]
2. Hands and forearms; feet and ankles	75
3. Skin of whole body	30

ADM03

The Level I and Level II values listed in Table 1 correspond to 2.5% and 7.5%, respectively, of these outdated annual limits.

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The current annual dose limits (see 10CFR20.1201; *NCRP Report 116*) are as follows:

	<u>Maximum yearly dose (rem)</u>
1. Effective dose (equivalent)	5
2. Lens of eye	15
3. Skin or any extremity (<i>hands and feet</i>)	50

Based on the current dose limits, Table 1 should be revised as follows (using the same formula of 2.5 and 7.5%)

TABLE 1 (proposed revision)

	Investigational Levels (mrem per calendar quarter)	
	<u>Level I</u>	<u>Level II</u>
1. Effective dose (equivalent)	125	375
2. Lens of eye	375	1125
3. Skin or any extremity (<i>hands and feet</i>)	1250	3750

Thank you for your attention to this matter.

Sincerely yours,



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