

**tyco**

Healthcare

**Mallinckrodt**

**DOCKET NUMBER**  
**PROPOSED RULE** PR 20  
(66FR 36502)

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September 21, 2001 (11:59AM)

OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

September 13, 2001

Secretary, U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555-0001  
Attn: Rulemakings and Adjudications Staff

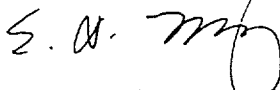
Ref: 10 CFR Part 20, RIN 3150-AG25, Revision of the Skin Dose Limit, Proposed Rule

Dear Secretary:

Tyco/Healthcare/Mallinckrodt is in favor of the proposed revision of the skin dose limit and agrees with the recommendations provided by the National Council on Radiation Protection. In addition to the ability to measure or calculate shallow-dose equivalent (SDE) from discrete radioactive particles (DRPs) on or off the skin and from very small areas of skin contamination, we are pleased that "any other source of SDE" is considered when averaging the measured or calculated dose over the most highly exposed, contiguous 10 square centimeters for comparison to the skin dose limit of 50 rem (0.5 Sv).

As Stakeholders, we appreciate the opportunity to comment on this proposed rule.

Sincerely,



Eric D. McKamey, CHP  
Manager, Radiological Affairs

EDM:jf

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SECY-02