

tyco

Healthcare

Mallinckrodt

DOCKET NUMBER
PROPOSED RULE PR 20
(66FR 36502)

Mallinckrodt Inc.
2703 Wagner Place
Maryland Heights, MO 63043

Tele: 314 654-2000
www.mallinckrodt.com

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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

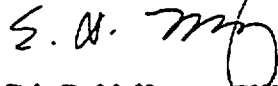
Ref: 10 CFR Part 20, RIN 3150-AG25, Revision of the Skin Dose Limit, Proposed Rule

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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