



*Council on Radionuclides and Radiopharmaceuticals, Inc.*

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**CORAR COMMENTS TO THE NRC ON EXTREMITY MONITORING**

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- The Council on Radionuclides and Radiopharmaceuticals (CORAR)<sup>1</sup> issued comments on 9/12/01 in support of the NRC's new skin and extremity shallow dose limit of 50 rem per maximally exposed 10 cm<sup>2</sup>.
- Since 1989, CORAR had collaborated with the NCRP and provided practical data that demonstrated that the dosimetry of small area skin contamination could be treated in a similar way to hot particles.
- The new NRC rule, published in 4/5/02, greatly simplifies demonstration of compliance for skin contamination. However, CORAR is aware that licensees and NRC and Agreement State inspectors are having difficulty in agreeing on means of demonstrating compliance with the new rule when the extremities are exposed to external radiation sources.
- CORAR's primary concern is the need to reach agreement on appropriate practical extremity dosimetry for well-controlled, normal routine operations.
- During the past 30 years licensees have reduced extremity exposure by using improved shielding and have documented exposure with improved and better placed dosimeters. Throughout this period, these industry practices have been successful in preventing deterministic effects, which is the primary goal of this regulation.
- CORAR seeks to obtain approval for current practices that demonstrate adequate protection and uniform recognition of these practices from NRC and Agreement State inspectors.
- CORAR members have experience with alternative practices as technologies have emerged. We believe the members' input and experience deserve consideration.
- We appreciate the opportunity for CORAR members to discuss practices and concerns with the NRC. CORAR intends to provide more detailed information for NRC consideration in the next few weeks.

Leonard R. Smith, CHP  
CORAR Chairman

<sup>1</sup> CORAR members include the major manufacturers and distributors of radiopharmaceuticals, radioactive sources and research radionuclides used in the United States for therapeutic and diagnostic medical applications and for industrial, environmental and biomedical research and quality control.