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HEALTH PHYSICS TECHNICAL SUPPORT

OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

DOCKET NUMBER  
PROPOSED RULE PR 20  
(68FR 14307)

Callaway Plant  
PO Box 620  
Fulton, MO 65251  
573/ 676-8380

March 27, 2003

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

The purpose of this document is to provide comments relative to "Direct Final Rule - Radiation Exposure Reports: Labeling Personal Information", published in the Federal Register, Vol. 68, No. 57, Tuesday, March 25, 2003, pages 14307- 14309.

The proposed rule amends 10 CFR 20.2203 to specifically require that the person's Social Security Number (SSN) be provided in the report, however, not all radiation workers have a SSN. Regulatory Guide 8.7, "Instructions for Recording and Reporting Occupational Radiation Exposure Data", recognizes this and provides five alternate means of identifying the worker as shown below.

The proposed rule should be revised to allow the use of the five alternates provided in Regulatory Guide 8.7 in the event that the worker does not have a SSN.

For your convenience, the applicable text from Regulatory Guide 8.7 is provided as an attachment to this document. Please feel free to contact me if you have any questions.

Sincerely,  
Christopher C. Graham  
Supervisor, HP Technical Support  
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cc: R. R. Roselius

## Attachment

### Regulatory Guide 8.7 - Instructions for Recording and Reporting Occupational Radiation Exposure Data

(Draft was issued as DG-8007)

Revision 1

June 1992

#### C. REGULATORY POSITION

##### 1. DETERMINATION OF MONITORING REQUIREMENTS

###### 1.5 Individuals with No Social Security Number

Doses to individuals who do not have a social security number, such as citizens of foreign countries, should be reported using another unique identification number. It is important to record the type of identification used in the data block labeled "ID type" that follows the "Identification Number" data block on NRC Form 4 and 5. The appropriate code listed below should be inserted in the blank labeled ID Type.

ID TYPE	CODE
U.S. Social Security Number	SSN
Passport Number	PPN
Canadian Social Insurance Number	CSI
Work Permit Number	WPN
INDEX Identification Number	IND
Other	OTH

The use of licensee-generated identification numbers should be avoided whenever possible.