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1

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Sander C Perle

ICN Worldwide Dosimetry

Clarification to my proposed revision to 10 CFR 20.1501[c], as published May 5, 2003

1. The intent is that only dosimetry used as a primary dosimeter shall require accreditation per the proposed rulemaking.
2. The intent is not for secondary dosimetry, that is dosimetry used in the event the primary dosimeter is lost, the calculated dose is questioned due to anomalies, the dosimetry is improperly worn, or other investigated reason, the primary dosimeter can not be used to assign the final dose of record.
3. Item 2 is currently the accepted method by the NRC and state regulatory agencies, and my proposed rulemaking does not intend to modify this practice. The intent is only for primary dosimetry to be accredited.

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