

From: Osiris Siurano-Perez *STD*
To: Robert Meck
Date: Tue, Jul 8, 2003 4:12 PM
Subject: Comments on DS 161

Please see attached!

CC: Josephine Piccone; Paul Lohaus

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This is in response to a June 26, 2003 electronic communication from Ms. Cheryl Trottier requesting comments on Draft Safety Guide 161, "Radioactivity in Material not requiring Regulation for Purposes of Radiation Protection". The following comments are provided for your consideration:

Section 1.2: language used seem to suggest natural occurring radionuclides happen because of the action of cosmic rays, which seems to be an incorrect assumption. We suggest using the following wording, which is consistent with the previous version of this document:

"Humans incur radiation doses from exposure to radionuclides, which can cause either direct irradiation from outside the body or be taken into the body and irradiate from within. Some radionuclides occur naturally within the environment and they are usually referred to as 'natural'. Others have been created as a result of human activities and are usually termed 'artificial'.

Section 1.8: term "exemption" appears to need a better definition or, otherwise, be clarified.

Section 2.1: consider redrafting information in this section. We suggest the following wording:

"In this section, the conceptual approach for establishing a set of activity concentrations above which regulatory control might be needed is discussed."

We appreciate the opportunity for providing comments on this matter.

Thanks.

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