

**From:** "Jackson, Alan (RSO)" <AlanJ@rad.hfh.edu>  
**To:** <SECY@nrc.gov>  
**Date:** Mon, Sep 25, 2006 3:07 PM  
**Subject:** RIN-AH40

Honorable Secretary, Nuclear Regulatory Commission:

I am writing in regard to Proposed Rule: RIN-AH40.

I am an applied health physicist at a large medical research institution. I also have experience in providing support to university research use including research reactors. I am submitting these comments as an individual.

I will address the four principle amendments separately;

A. Annual Dose report to Workers.

I believe that the 100 mrem criterion is quite reasonable.

In hospital and university programs, very large numbers of employees are given dosimeters. In some cases it is part of an effort to build public trust. These efforts should not be complicated by a need to provide these dose reports. The cost savings to hospital and universities would appear to be larger than those indicated by previous commenters due to the large number of employees involved. This task of providing reports can be difficult to the ephemeral nature of our workers. In many cases it is necessary to provide dosimeters to groups such as students because of some very small probability that they will do something unexpected that will result in any exposure above 100 mrem.

B. Definition of TEDE

I consider this definition to be quite reasonable and essentially non controversial.

C. Labeling containers

Unlike nuclear power plants which have very large health physics and legal staff, other license types likely did not respond to the proposed rule for these reasons. I disagree with the commissions' analysis which suggests that the exemption is not appropriate "due to the many types of radioactive material." Power reactors have vastly more types of radioactive material and a great range of activity because of the mixtures of fission and activation products. In contrast, university and medical areas typically have extremely pure and well defined materials which are typically used under very controlled conditions. The vast majority of these uses employ extremely low quantities of material which frequently have extremely short half lives. I believe that a dichotomy in the rules for nuclear power plants and other licensees is unjustified.

#### D. Cumulative Occupational Dose

I find this proposal to be completely logical. Up to this point, licensees have been subsidizing future possible epidemiological studies. The only reason this requirement has been maintained is inertia. The existing rule has forced licensees to depend upon the actions of other institutions. Also employees now regard question about their past, particularly the need to determine previous names, as potentially risky due to concerns about identity theft. The costs savings to medical and university licensees are quite significant due to the large number of employees involved.

In general the proposed rules are quite reasonable and I applaud the Commission's efforts to reduce these unnecessary regulatory burdens.

Thank you for considering my comments.

-Alan

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