

**PR 19, 20 AND 50
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Comment No. 2

From: <norris.johnson@srs.gov>
To: <SECY@nrc.gov>
Date: Tue, Sep 26, 2006 11:37 AM
Subject: RIN 3150-AH40 Comments

Sir,

The following comment is made as a member of the public, not as a representative of the Washington Savannah River Company or the Department of Energy.

Federal Register/Vol. 71, No. 184 / Friday, September 22, 2006, page 55392, section 3.3.4, Cumulative Occupational Radiation Dose

The cost savings from the proposed change are under-reported. You have consider the savings to the facility that has previously been required to request a new employee's exposure history from their previous employers. You have neglected to include the cost savings that will be realized by the facilities from whom those records are being requested. Prior employers will no longer have to expend time and effort to research their records and respond to the new employer's request. If the employee moves to another job, this process is repeated.

If the new employee has worked at an average (my guess) of two previous radiological companies and the average cost is \$10.00 per company (\$20.00 total) to research and respond to a request, then an additional savings of \$44 million to the industry will result.

Sincerely,
Norris Johnson
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Washington Savannah River Company
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Regulatory and Radiological Technology Group
Radiological Protection Services Section
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