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Dear Sir/Ma'am,

I am writing to comment on a proposed rule to eliminate the need for reporting annual dose to workers as long as the dose received is less than 1mSv (100mrem). I believe this rule is at least, partially inadequate. While I do agree that this rule will potentially relieve an administrative burden, there exists a flaw.

If there is an operator who is expected to receive a special planned exposure, dose records must be obtained from previous employers. I believe this portion is not adequate. The reason for obtaining an employee's lifetime exposure is to allow for a total risk assessment in planned and emergency situations. There is great potential for someone to exceed the lifetime exposure limit during an emergency situation. Granted, in an emergency situation the dose limits do not necessarily apply, but if there is an opportunity for another employee who will probably not exceed their lifetime exposure to perform the tasks, it should be taken. Therefore, I propose that the rule be amended to not require employers to retrieve all previous exposure information, but require the employee to retrieve this data. This will alleviate an administrative burden on the employer, and allow the employee to show a little dedication to working for the employer.

I agree with the dose reporting requirements with the exception of one part. There should be a reporting requirement at the termination of employment or if the employee develops a medical condition which could potentially affect their ability to receive occupational exposure. If an employee terminates employment and seeks new employment at a different employer, then they need to be notified of their dose so that they may inform their new employer.

Thank you for allowing my comment to be posted

DOCKETED
USNRC

Sincerely,
Jason D. Hout

October 3, 2006 (4:13pm)

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

Template = SECY-067

SECY-02

From: Carol Gallagher
To: SECY
Date: Tue, Oct 3, 2006 1:05 PM
Subject: Comment on Proposed Rule - Occupational Dose Records, Labeling Containers and TEDE

Attached for docketing is a comment letter on the above noted proposed rule from Jason Hout that I received via the rulemaking website on 10/1/06.

His e-mail address is jsond13@aol.com

Carol

Mail Envelope Properties (45229851.D25 : 5 : 35764)

Subject: Comment on Proposed Rule - Occupational Dose Records, Labeling Containers and TEDE

Creation Date Tue, Oct 3, 2006 1:05 PM

From: Carol Gallagher

Created By: CAG@nrc.gov

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