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Subject: Proposed Rule: RIN-AH40.

October 12, 2006 (4:30pm)

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

Good afternoon,

I am writing in regard to Proposed Rule: RIN-AH40. Although I am the radiation safety officer of a large university research institution, I am submitting these comments as an individual.

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I will comment on two of the four proposed amendments separately;

A. Annual Dose report to Workers.

I believe that the 100 mrem criterion is quite reasonable for required reporting to monitored workers. This 100 mrem is significantly above normal background so that it will be reporting a real exposure for which the individual should be informed.

At my institution many employees are given dosimeters but probably only about 5% need them by the current regulations. In many cases they are issued to provide long term comfort to administration rather than to provide for safety of the workers. Others are issued to provide comfort to personnel using minimal amounts of radioactive material * in an effort to reduce the fear factor. There are even janitors and secretaries issued dosimeters who have never had a reported exposure greater than 10 mrem in a quarter. These efforts should not be complicated by a need to provide annual dose reports, particularly when 95% of the reports are minimal.

D. Cumulative Occupational Dose

This proposal should have been implemented ten years ago. The purpose requesting previous exposures goes back to the cumulative dose limit of 5 rem times (age -18). This limit also allowed for an annual exposure of 12 rem per year (as I recall). When the annual limit was changed to 5 rem, the need for previous years exposure evaporated. The rest of the regulated community should not be punished for the exceptionally rare planned special exposure.

I believe the cost savings listed in the proposed change are under estimated. The cost to the institutions providing the documentation must also be factored into the equation.

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.

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