

**PR 19, 20 and 50**  
**(71FR55382)**

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**From:** "SANDY J WOLFF" <SJWOLFF@sentara.com>  
**To:** <secy@nrc.gov>  
**Date:** Wed, Dec 6, 2006 12:28 PM  
**Subject:** [AMRSO] [Fwd: RE: AMRSO Comment on Federal Register Posting]

As a member of AMRSO, I submit their position as my position as well, as indicated below:

Re: RIN 3150--AH40

Academic Medical Radiation Safety Officers (AMRSO) appreciates the opportunity to comment on the proposed regulatory changes. AMRSO is a moderated listserve whose membership, by group consent, is restricted for size considerations to RSOs or a designee at medical and academic/research institutions only. At present there are over 400 members of AMRSO.

**A. Annual Dose Report to Workers**

AMRSO agrees with the concept that there is a defined dose threshold for formally reporting doses to radiation workers. However, we feel that it is much more logical to use 500 millirem as threshold. The NRC has rejected this argument on grounds that the number of additional individuals for whom annual reports would need to be prepared is small. This does not, however, address why reporting is required for an individual that had a better prospective evaluation been performed would not have required monitoring.

It is common practice in the academic and medical radiation safety community to monitor individuals for whom monitoring is not required under §§20.1502. These monitored individuals while not likely to receive a total effective dose equivalent more than 500 millirem, may receive a total effective dose equivalent over 100 millirem. This creates a situation where two individuals can receive the same dose, but the licensee would only have to provide one individual with an annual report.

**B. Definition of Total Effective Dose Equivalent (TEDE)**

AMRSO supports the change to the definition of Total Effective Dose Equivalent; however we are concerned with the requirement that "the deep-dose equivalent must be used in place of the effective dose equivalent, unless the effective dose equivalent is determined by a dosimetry method approved by the NRC" in §§20.1201. We are concerned that there is no basis for the NRC to approve dosimetry methods. We recommend allowing the use of effective dose equivalent when the methodology is in accordance with a nationally recognized standard or when the methodology is in accordance with the radiation control agency with jurisdiction.

**C. Labeling Containers**

AMRSO is not affected by these changes; therefore, we has no comment.

**D. Cumulative Occupational Radiation Dose**

The AMRSO supports these changes. Since lifetime cumulative radiation exposures are no longer regulated, this information is not significant.

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 USNRC

December 6, 2006 (1:30pm)

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We recommend an additional change to §§19.13: remove "the individual's social security number" from paragraph (a). The need for social security number is important when checking an individual's radiation exposure history as it uniquely identifies an individual and generally does not change over time. Having eliminated the need to create and report these exposure histories, likewise reduces the importance of collecting and maintaining the individual's social security number. Further, this has the very real risk of identity theft which would be much more detrimental to an individual's well-being than the possibility of providing the individual with a wrong dosimetry report.

Please note that these comments are a consensus of the AMRSO and as such do not necessarily reflect the opinion of any individual member or the moderator. Thank you for your consideration of these comments.

Thank you,  
Sandy Wolff, MS, CHP, DABR  
Radiation Safety Officer, Sentara Hospitals  
Voice (757) 388-3030  
Pager (888) 341-5703  
Fax (757) 388-3718

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