

ENVIRONMENTAL HEALTH and SAFETY

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Rulemaking and Directives Branch  
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*75 FR 3760*  
*(2)*

Re: Draft Regulatory Guide DG-8037, *Information Relevant to Ensuring that Occupational Radiation Exposures at Medical Institutions Will Be As Low As Reasonably Achievable*

Dear sirs and mesdames,

Thank-you for the opportunity to review the draft revision of the ALARA regulatory guide for medical institutions. I laud the hard work the authors contributed to update this valuable document. I offer a few comments for your consideration.

1. On page 3, paragraph 1.e. has a footnote marker by RSO (i.e., (RSO)<sup>3</sup>), yet there is no such footnote.
2. On page 2, B, second paragraph, the following phrase is misleading and too ambiguous for a regulatory document providing ALARA guidance, "coupled with the knowledge that certain radiation effects are **irreversible and cumulative**". As noted above, ALARA applies to exposures below the dose limits for occupational workers and members of the public. I do not know of any irreversible or cumulative effects at doses below the dose limits. Biological effects below the dose limits are theoretical, precautionary, and based on observed effects in populations exposed to much higher doses. A more accurate phrase would be: "coupled with the assumption that certain radiation effects are irreversible and cumulative".

Sincerely,

*Thomas Mohaupt*  
Thomas Mohaupt, M.S., CHP  
Radiation Safety Officer

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*SUNSI Review Complete*  
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*Call = H. Karagiannis (hxx)*  
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