

**NRCREP Resource**

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**From:** charles [cbmeinhold@optonline.net]  
**Sent:** Wednesday, September 09, 2009 12:12 AM  
**To:** Regs4rp Resource  
**Subject:** FW: Comments on adoption of ICRP 103

2010 APR -1 PM 2: 54

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**From:** charles [mailto:cbmeinhold@optonline.net]  
**Sent:** Tuesday, September 08, 2009 11:24 AM  
**To:** 'Reg4RP@nrc.gov'  
**Subject:** Comments on adoption of ICRP 103

7/07/09  
74FR 32198 (12)

Dear Recipient,

I most strongly believe that the recommendations contained in ICRP Publication 103 should be contained in NRC's Regulations on Radiation Protection. This is particularly important for Dose Limits, Updated Radiation Weighting factors, and Tissue Weighting factors.

An important point with regard to dose limits is that to dose limits apply only to the most highly exposed individuals and good radiation protection practice keeps the dose to the majority of workers far below the dose limits.

I have frequently brought attention to serious issue of coherence in NRC adopting ICRP Publication 60 Risk estimates while maintaining the ICRP Publication 26 Tissue Weighting factors. For example, if the stomach and colon do not have specific tissue weighting factors, the risk estimates of 4 and  $5 \times 10^{-2}/\text{Sv}$  would not be true.

I would be happy to discuss this matter with members of your staff.

Charles B Meinhold

*SUNSI Review Complete  
Template = ADH-013*

*E-RFDs = ADH-03  
Add = J. Cost (dac)*