

**Resolution of Public Comments Received on Draft Regulatory Guide (DG) - 8037,  
 “Information Relevant to Ensuring that Occupational Radiation Exposures at Medical Institutions will be As Low  
 As is Reasonably Achievable.”**

During the public comment period for Draft Regulatory Guide DG-8037, which ended on March 19, 2010, the Nuclear Regulatory Commission (NRC) received comments from the Organization of Agreement States (OAS) and the St. Jude Children Research Hospital. The NRC staff has carefully reviewed the draft and addressed the comments as appropriate. The following table summarizes the comments and staff’s response to them.

Comments were received from:  
 Shawn W. Seeley, OAS Chair  
 Maine Radiation Control Program  
 286 Water Street, 4<sup>th</sup> Floor  
 Augusta, ME 04333-0011  
 207-287-5696  
[shawn.seelevy@maine.gov](mailto:shawn.seelevy@maine.gov)

Thomas Mohaupt, MS, CHP, Radiation Safety Officer  
 St. Jude Children's Research Hospital  
 262 Danny Thomas Place  
 Mail Stop 730  
 Memphis, TN 38105  
 907-595-2957

	Issue	Organization	Citation	Comment	Response
1	Editorial	St. Jude Children’s Research Hospital	Page 3, paragraph 1(e)	Has a footnote marker by RSO (i.e., (RSO) <sup>3</sup> ), yet there is no such foot. has a footnote marker by RSO (i.e., (RSO)'), yet there is no such footnote.	NRC agreed with the comment.
2	Too ambiguous	St. Jude Children’s Research Hospital	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."	NRC agreed and replaced the word “knowledge” with “assumption.”

3	Address	OAS	General	<p>One drawback that we find is that this guide addresses only radioactive materials subject to licensing by the NRC. Furthermore, the guide does not address effluents to unrestricted areas. Therefore, the Regulations and recommendations of other State and federal Agencies should be consulted for ALARA considerations when dealing with x-ray machines, radiation emitting equipment and materials not licensed by Nuclear Regulatory commission (NRC)</p>	<p>The NRC responded by adding the reference of Regulatory Guide 8.37, "ALARA for Effluents from Materials Facilities." The NRC does not have to address ALARA for using x-ray machines, because it is beyond NRC jurisdiction.</p>
---	---------	-----	---------	---	---