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General Comment

I am a Radiation Safety Officer for an Industrial Radiography company. We would be opposed to any changes in the annual exposure limits for radiographers. The impact to us would be as of year to date numbers 9 radiographers would be out of a job for the remainder of the year with more to follow as the months pass by. Industrial radiographers performing our work typically receive 200mr - 300mr monthly using ALARA protocol. We have never had anyone exceed the 5r limit and manage this strictly within the current guidelines. I our opinion if you take a sysytem that has been in place for years and tell workers they are reduced by more than half of the current guidelines or they are out of work, you will promote misconduct in the monitoring process. People could be inticed to choose a paycheck over compliance with a rule they see as overly burdensome and not necessary.

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