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REF: NRC-2009-0279
Radiation Protection Regulations and Guidance
10 CFR Part 20

Following are comments relative to the consideration for changes to 10 CFR Part 20, and are listed in the order presented in the September 27, 2010 *Federal Register*.

Issue No. 1: Effective Dose and Numerical Values

Issue No. 1.1: Leave the current terminology alone. Computer programs are set, and would require significant reprogramming with no additional benefit to public health and safety.

Issue No. 1.2: Using updated scientific data is always positive. I am in favor of using the updated tissue and radiation weighing factors provided in ICRP Publication 103. I am not in favor of waiting for and using data published by the EPA. First, it takes the EPA forever to complete a study, and second the accuracy of their data is always suspect.

Issue No. 2: Occupational Dose Limits

Leave the dose limits as they are currently – 5 rem (50 mSv) per year. To lower these limits would place occupational employees from a number of industries at a significant disadvantage. For example, some radiographers, cardiologists, etc. already receive annual exposures exceeding 2 rem, and to lower the annual limit to 2 rem would be detrimental to their livelihood. There is no scientific data to indicate any increased risk from exposures at 5 rem per year.

Issue No. 3: Doses to Special Populations

Issue No. 3.1: Dose Limits for Embryo/Fetus of a Declared Pregnant Worker
I concur with the ICRP recommendation to allow 100 mrem (1 mSv) exposure after the declaration of pregnancy. This eliminates the necessity of determining

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exposure prior to the declaration, and gives the female the flexibility for deciding when to make the declaration.

Issue No. 3.2: Dose Limits for Members of the Public, Alternative Provisions for 500 mrem (5 mSv)

Licensees need to have the flexibility to request increased dose limits to cover unforeseen circumstances. Therefore, option 3.2-a is the better choice: No change. Continue to allow a dose limit of 0.5 rem (5 mSv) per year, applicable only upon specific approval of a licensee request.

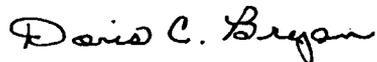
Issue No. 4: Incorporation of Dose Constraints

Option 4.a. No change is most appropriate. There is no reason or benefit to incorporate the use of constraints into the NRC's radiation protection framework. The current regulations work well, and licensees already go to great lengths, through procedures and/or work practices, to implement radiation protection programs which limit exposures As Low As Reasonably Achievable. The word "constraint" is ill defined and confusing – therefore, unnecessary.

The current NRC and Agreement State regulations are already very restrictive in many areas. However, they work well and licensees have done a good job in implementing the many changes which have taken place over the past years. There is absolutely no reason, nor any benefit to public health and safety, to make changes just to go along with the rest of the world.

Sincerely,

Radiation Technology, Inc.



Doris C. Bryan, President
Radiation Safety Officer