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Potential Changes to Radiation Protection Regulations; Solicitation of Public Comment

Comment On: NRC-2009-0279-0037

Impact of Reduced Dose Limits on NRC Licensed Activities; Solicitation of Public Comment

Document: NRC-2009-0279-DRAFT-0039

Comment on FR Doc # 2011-17308

Submitter Information

Name: Cindy Tomlinson

Organization: ASTRO

General Comment

Please find attached the American Society for Radiation Oncology's (ASTRO) comments on NUREG/CR-6112.

Attachments

Comment Letter Radiation Safety Guidance08-05-11

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 RULES AND DIRECTIVES
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Cde = T. Brock (Tab 2)*



August 5, 2011

Electronically Submitted VIA: www.regulations.gov

Cindy Bladey
Chief, Rules Announcements and Directives Branch
Office of Administration
Mail Stop: TWB-05-B01M
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Re: Comments on Impact of Reduced Dose Limits on NRC Licensed Activities [Docket No. NRC-2009-0279, See 76 FR 40755 (July 11, 2011)]

Dear Ms. Bladey,

The American Society for Radiation Oncology (ASTRO) appreciates the opportunity to provide comments to the U.S. Nuclear Regulatory Commission (NRC) on the Impact of Reduced Dose Limits on NRC Licensed Activities. ASTRO commends the NRC for conducting a thoughtful review process on this issue before revising NUREG/CR-6112 to accompany the rulemaking on the same subject.

ASTRO is the largest radiation oncology society in the world, with more than 10,000 members who specialize in treating patients with radiation therapy. As the leading organization in radiation oncology, biology and physics, the Society is dedicated to improving patient care through education, clinical practice, advancement of science and advocacy.

As we mentioned in our comment letter on the proposed regulation (January 31, 2011), ASTRO does not believe that a change in the NRC's radiation protection regulations is necessary at this time. However, should the NRC decide to make changes, we believe that those changes should be made using science and sound data – not because of pressure from the international community. The United States should be a leader in this area, not a follower. Changes to current protection regulations and guidance, especially those that affect the practice of medicine and radiation oncology, must be made with careful attention to the unique requirements of the health care system in the United States. These types of requirements and constraints cannot be “one-size-fits-all,” but rather they must conform to the community being regulated, not with the rest of the world.

Licensees operate under the principle of “as low as is reasonably achievable” (ALARA). This limit is lower than the maximum dose, and is, by its very nature, already limiting exposure. Currently, common practice sets ALARA limits at about 10% of the allowed maximum dose or 0.5 rem per year. Investigational levels fall below that. ASTRO recommends that any change in the maximum dose not change the normally accepted ALARA limits – limits that are already

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cautiously low. Lowering the acceptable ALARA limits could cause serious disruptions to patient care. In particular, a radiation oncology practice that provides a significant amount of brachytherapy could be seriously impacted.

Finally, ASTRO is pleased that the NRC has solicited comments on revisions to NUREG/CR-6112. We feel that guidance is important because without it, it will be very difficult for licensees to assess the full impact of the proposed regulations and make substantive and informed comments.

Thank you for affording ASTRO the opportunity to provide comments on the Impact of Reduced Dose Limits on NRC Licensed Activities. Again, we are very pleased with NRC's approach to soliciting input from the community prior to revising NUREG/CR-6112. We look forward to working with the NRC on this issue. Please contact Cindy Tomlinson, Manager of Regulatory Affairs at 703-839-7366 or cindy@astro.org if you have any questions.

Sincerely,



Laura I. Thevenot
Chief Executive Officer

Cc: Terry Brock, Acting Branch Chief, Division of Systems Analysis, Office of Nuclear
Regulatory Research