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

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RULES & REGULATIONS

General Comment

GE Hitachi Nuclear Energy ("GEH") appreciates the opportunity to submit comments regarding the NRC's efforts to revise NUREG/CR-6112, "Impact of Reduced Dose Limits on NRC Licensed Activities," published May 1995. The NRC is considering revising the NUREG to achieve greater alignment with 2007 recommendations of the International Commission on Radiological Protection ("ICRP") contained in ICRP Publication 103. The revised NUREG would include updated information regarding potential impacts, burdens, and benefits of reduced occupational limits on NRC- and Agreement State-licensed activities.

GEH agrees with the NRC's approach to undertake this effort to revise NUREG/CR-6112, and to take a "fresh look" at the impact of new dose limits. The NRC has an opportunity to evaluate ~15 additional years of data (1995 through 2010) from nuclear power plants, fuel fabricators, enrichment facilities, industrial radiographers, and nuclear pharmacies. The additional data are more representative of current exposure trends and may provide valuable insights in the NRC's decision-making process regarding its regulatory framework and the ICRP recommendations.

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