

Rulemaking Comments

From: Gallagher, Carol
Sent: Tuesday, October 11, 2011 9:33 AM
To: Rulemaking Comments
Subject: FW: FSME-11-084 - Opportunity to Comment on the New International Commission on Radiological Protection Recommendation to the Lens of the Eye

DOCKETED
USNRC

Docket under 76 FR 53847

October 11, 2011 (10:46am)

From: Vinson, Gibb [<mailto:Gibb.Vinson@illinois.gov>]
Sent: Thursday, October 06, 2011 4:34 PM
To: Gallagher, Carol
Cc: Eastvold, Paul
Subject: RE: FSME-11-084 - Opportunity to Comment on the New International Commission on Radiological Protection Recommendation to the Lens of the Eye

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

The Illinois Emergency Management Agency, Division of Nuclear Safety (the Agency), hereby submits its comments regarding proposed IAEA changes to the lens of the eye. Unlike other portions of the IAEA dose limit recommendations (5 rem/yr to 2 rem/yr TEDE), the Agency supports the change for dose to the lens of the eye (LDE) going from 15 rem/yr down to 2 rem/yr. This one actually appears to be based in science and observed effects. However, the difficulty with this proposal lies in determining compliance with the limit. In effect, if a person is wearing external dosimetry and that badge shows less than 5 rem but more than 2 rem, the licensee may have actually documented a violation of the lens dose unless they can demonstrate otherwise. On the other hand, application of dose limits to the eye as measured by a film badge is in effect also lowering the whole body dose which is not warranted either. The best answer is probably the use of collar dosimeter for LDE or protective eyewear with a TLD/OSL chip in the frame. It may also be possible for an algorithm to be adopted that can take the value determined from a whole body badge and then extrapolate the dose to the lens. Such a method would have to be approved by a nationally recognized organization. The cost to licensees for additional dosimetry/assessment would also have to be considered.

Thank you for the opportunity to comment on this important matter.

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Please visit the nuclear safety section of the Agency's website at www.iema.illinois.gov/iema/dns.asp for the latest information concerning the Division of Nuclear Safety's programs. Our website includes important information such as new and proposed requirements, guidance, events and other pertinent items of interest.

From: Donald L. Saah [<mailto:donald.saah@nrc.gov>]
Sent: Friday, September 02, 2011 3:50 PM
To: Vinson, Gibb
Subject: FSME-11-084 - Opportunity to Comment on the New International Commission on Radiological Protection Recommendation to the Lens of the Eye

The subject line letter, FSME-11-084, is contained in the attached electronic file, and can be found at the FSME website: <http://nrc-stp.ornl.gov/>.

Thank you.