

Rulemaking Comments

**From:** Cari Borrás [cariborras@starpower.net]  
**Sent:** Monday, October 31, 2011 5:08 PM  
**To:** Rulemaking Comments  
**Cc:** Cool, Donald  
**Subject:** ID NRC- 2009-0279

DOCKETED  
USNRC  
November 1, 2011 (10:15 am)  
OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

Having been in the radiation protection field for almost 50 years - my latest contribution the participation in the drafting of the new "International Basic Safety Standards for Protection against Ionizing Radiation and for the Safety of Radiation Sources"- I would like to recommend that NRC "**Change the current requirements by adopting the ICRP-recommended dose values**".

It is very important that the NRC align its regulations with international standards. We have seen the problems that the disparity between US and foreign radiation protection quantities and units is continuously causing. The US needs to communicate effectively with its counterparts in other countries so that tissue doses and risks (in this case to the lenses of the eye), can be properly assessed.

Cari Borrás, D.Sc., FACR, FAAPM