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General Comment

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In conjunction with developing a requirement for ALARA planning, the NRC is considering developing a mechanism to address additional protection when an individual occupational worker nears his or her annual dose limit, and developing cumulative dose criterion that would control doses that an individual worker may receive over a multiple-year period. In this regard, the NRC would require each licensee, as a part of its radiation protection program, to establish mechanisms to examine cumulative occupational doses, and to implement control measures limiting additional doses if an occupational worker approaches his or her cumulative dose criterion. If the NRC ultimately issues such a requirement, it would develop associated guidance to address the various types of licensed activities.
Specifically, regulatory guidance could describe the types of methodologies that the NRC staff could consider acceptable to meet the regulatory requirement of controlling dose as an individual occupational worker approaches the annual dose limit, or his or her cumulative dose criterion.

I find it difficult to believe that the NRC would be resurrecting the paperwork equivalent of the old (Age 18) * 5 rem dose limit. This involved a terrible amount of paperwork even for those institutions in which the average exposure level was in the 100 mrem range. Other institutions as a matter of course would request complete exposure histories of individuals who had worked at my institution (a university) because the individual had taken a class in which radioactive material was used or simply toured the nuclear reactor facility. My university

did not routinely bother others with requesting dose history information because exposures were normally well below 100 mrem,

Other institutions were not so kind. When a request is made it must be promptly answered. Digging through decades of files looking to show that J. Doe only received M exposures during the sixteen quarters he/she was badged is not productive for anyone. This task will be more difficult now than twenty years ago because social security numbers are not used to track identities. Consider for yourself how easy it is to remember your student ID number fifteen years after graduation and submit it as part of a dose history request.

This tracking is required you say because some people work at multiple institutions and dont supply their radiation safety office with their exposure history. This is not surprising since many of these individuals fail to wear their dosimeters regularly.

The current regulation already requires this tracking: 20.1201 Occupational dose limits for adults. (f) The licensee shall reduce the dose that an individual may be allowed to receive in the current year by the amount of occupational dose received while employed by any other person (see 20.2104(e)).

What is missing from this tracking is that it should be the responsibility of the dosimetry user to wear the dosimeter and report the exposures to all their employers. A regulation in 20.2104 requiring individuals to specifically notify their employers of exposures received at all other institutions would solve this problem. Of course fines would have to be imposed to ensure compliance. Some people would take the chance of not reporting because it is against company policy to work at more than one location or so they dont run up against an exposure limit.

If the NRC wants documentation of an individuals exposures to all sources, then the NRC has to provide a method to track these individuals. If this were 1990 the NRC could require all licensees to use social security numbers for tracking exposures. Then the NRC could obtain reports from Landauer, and the two or three other dosimetry providers and have all the data needed. Since it is now impossible to obtain SSNs from potential radiation workers the only alternative is for the NRC to issue Radiation Work Numbers on a national level. Then exposures could be tracked easily and accurately. This would probably take an act of Congress. Good luck with that!

In conclusion:
I think the whole idea of supplying dosimetry data to the NRC from the thousands of institutions in the country is terrible.
I think a cumulative exposure limit is will result in more work for the regulated community and more bogus exposure reports as people try to limit their exposure by shielding their dosimeters from exposures. This already occurs and a cumulative limit will make it more common.
If the NRC wants records of all exposures the NRC needs to make it clear in the regulations that it is the responsibility of the dosimeter wearer to report all exposures to all employers.