

# PUBLIC SUBMISSION

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## Submitter Information

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## General Comment

I hereby would like to express my opinion regarding the amendment of NRCs primary radiation protection regulations in part 20 of Title 10 of the Code of Federal Regulations (10 CFR). I basically agree with this amendment to align regulations with International Commission on Radiological Protection (ICRP)s recommendations in 2007. When there are several organizations each having different standards, it is very confusing to the public. I assume it is very important for both organizations to have coherent regulation. As many countries are starting to comply with this standard, it is better for NRC to comply as well. Concerning the amendment lowering the occupational dose limit from 50 mSv per year to a 5-year average of 20mSv per year, I agree with this change. Even with such regulation, as it is hard to tell what exact dose the employee was affected, I assume it is important to limit exposure to radiation small as possible. Although it is understood that there would be no serious affect to human body as long as radiation exposure is limited under 100 mSv annually, it is better to limit it as small as possible. We are still on our way of research and do not know what are the true affects of radiation. With more technology improvement and more better understanding about radiation, we may change this number to more feasible number balancing with our economy development.

I also agree with lowering the dose limit of embryo/fetus of a declared pregnant occupational worker. Fetus is very vulnerable to the radiation and it is very important to protect them even before they are born. It is our obligation to protect them from unwanted disability or disease. I understand that it is female workers obligation to declare their pregnancy to their employer so that their radiation exposure would be limited, and NRC would not require the licensee any strict limit to be exercised upon such woman who do not declare. However, for woman, pregnancy is very sensitive problem. There may be a case that it is impossible for a woman to declare to their employer or they dont even notice that they are pregnant. I understand it is very difficult to determine who is responsible, but I assume it is important for the employer to care those potential pregnant women as well. I agree to require NRCs licensees to apply the ALARA (as low as reasonably achievable) principle. It is true that each industry related to radioactivity has different feature and different chance of exposure. Even if a

certain occupation requires an employee for higher dose and it is necessary for our development of economy, it is very important to keep it as low as possible. However I think it would be a concern that the interpretation of word reasonable differs depending on person and situation.

For requirements in reporting of occupational exposure, I suppose NRC should require Agreement States to adopt 10 CFR 20.2206 and require licensees to submit annual reports of occupational radiation dose information. Because I assume it is very important for employers to take care of their members very carefully. As I mentioned before, we cannot see radioactivity, and so it is difficult to see how much dose employees are under exposure. With such reporting requirement, I assume more employers would be careful about their employees so that it would not violate the regulation.

Again, I understand the goal of this amendment in part 20 of 10 CF. Basically I agree. However as I mentioned above, there are some points that I assume NRC should consider more. NRC should continue to research and consult with other countries like Japan. After Fukushima incident, there should be more improvement in knowledge regarding the affect of radiation.