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# PUBLIC SUBMISSION

**Docket:** NRC-2016-0182

Individual Monitoring Devices for Industrial Radiographic Personnel

**Comment On:** NRC-2016-0182-0002

Individual Monitoring Devices for Industrial Radiographic Personnel; Notice of Docketing and Request for Comment

**Document:** NRC-2016-0182-DRAFT-0008

Comment on FR Doc # N/A

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## Submitter Information

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## General Comment

See attached file(s)

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## Attachments

NRC comments

These comments are to support the proposed changes as requested by NDTMA and ASNT in Docket No. PRM-34-7;NRC-2016-0182.

On the use of dual-functioning devices, this should be changed as the newer electronic devices can easily be used for ED and ARM as the devices can be set for tracking dose (ED) and dose rates (ARM). The electronic device as combined makes it easier for the technician as they only need 1 piece of equipment instead of 2. Many of these have vibration, visible and audible alarms as well as earphones for noisy environments. With digital read outs they are much easier to check.

On the use of digital personal dosimeters instead of TLD's, OSLDs and film badges, the digital dosimeters allow for immediate processing of the information without sending the device off for reading. The worker (and RSO) can have immediate information on dose so that if an over exposure is suspected it can be confirmed or determined that there has not been an overexposure and the worker can return to work. Having each individual with the ability to have their dose available to them for review will give them the ability to better manage their dose. It will also give the RSO more time to concentrate on other duties.

Using an approved NVLAP processor with the capabilities to process individuals data immediately saves time by not having to accumulate all of the badges to send for processing, mailing the badges and waiting for a response which may be 15 to 20 days after the monitored month has ended. It also eliminates the possibility of losing the badges in the mail.

There is at least 1 company using the digital personnel dosimeters and they have documented evidence of lower worker exposure using this equipment.

The rules as written were made before these types of devices were available and the rules need to be updated to encompass the current technology.