

## RulemakingComments Resource

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**From:** Cody A. Bayn <Cody.Bayn@cmsenergy.com>  
**Sent:** Wednesday, February 08, 2017 11:21 AM  
**To:** RulemakingComments Resource  
**Subject:** [External\_Sender] Regarding PRM-34-7 ; NRC-2016

“I believe the NRC should allow dual dosimeter/rate alarm units to be legal for use. I understand the logic of a single unit being a weak point and I fully comprehend the added layers approach that they intend to implement by requiring separate pieces of equipment. Having said that, I have a lot of experience calibrating and troubleshooting various forms of dosimetry and radiation safety equipment that has been used in actual industrial radiographic operations. In my experience, the RA-500 and pencil dosimeter approach is actually a weaker approach compared to a dual function single unit such as DMC-3000. My experience has shown the pencil style dosimeters to be incredibly fragile, inaccurate, and unreliable. For example, I would typically have to throw out one pencil style dosimeter for every six I calibrated due to not holding a dose for 24 hrs, or for having inaccurate dose readings. These also cause many problems when dropped, by going off scale- thus requiring an employee stop working (even though it is essentially obvious there is no dose) and requiring an employee to have a film badge processed at a rush fee. The RA-500 units seem to be a little more rugged, but are big and bulky, frequently getting banged around and caught on things. While calibrating these items, with no regard to their fragility, I also notice a huge difference in the overall reliability of these multi-function/ new technology units to accurately determine dose/dose rate. With safety being my number one goal, I still find these units to be a better choice- even when taking into account the multi layered approach. I would conclude by reiterating, I believe the NRC should allow dual function dosimeter/rate alarm units to be used instead of requiring 2 separate units for these functions”