

DEPARTMENT OF RADIOLOGY  
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OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

Secretary of the Commission  
U.S. Nuclear Regulatory Commission  
Washington D.C. 20555

DOCKET NUMBER  
PROPOSED RULE

*PR-Misc. Notice*  
*(Reg Guide)*

ATTENTION: DOCKETING AND SERVICE BRANCH

Commentary on the Draft Regulatory Guide for License in  
Medical Tele-Therapy Programs.

Item 13C "Calibration of Dosimetry Systems".

The calibration of the dosimetry systems at two year interval  
is impractical for several reasons:

- a). The NBS and the few Regional Calibration Laboratories  
accredited by the AAPM are overloaded with instruments  
to be calibrated. A waiting period of six months to  
one year to have the system accepted for calibration  
is not uncommon.
- b). Institutions with only one dosimetry system can be  
several months without any instructions at all.  
The reason for that is the time required for the  
chambers and electrometers to be at the laboratory  
before calibration and the delay in receiving the  
writing report after the calibration is done, indicating  
the proper correcting factors.

Because the monthly calibration of the CO-60 unit serves  
as the periodical calibration check of the instrument, a  
four year interval between NBS or regional certified calibration  
laboratory check of the dosimetry systems will be more  
practical.

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