

Mayo Clinic

PETITION NUMBER
PETITION RULE PRM ~~20-23~~
(59 FR 17746)

Rochester, Minnesota 55905 Telephone 507 284-2511

DOCKETED

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Richard J. Vetter, Ph.D.
Radiation Safety Office

OFFICE OF THE SECRETARY
DOCKETING AND SERVICE
BRANCH

Secretary of the Commission
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Attention: Docketing and Service Branch

RE: Petition for Rule Making by Steve Gannis (PRM-20-23)

Subject petition assumes that all members of the public receive 100 millirem annually. In fact, a very small fraction of the public receives radiation dose (from licensed activities) that approaches this level. Nearly all members of the public receive no ionizing radiation exposure from facilities licensed to use radioactive materials or radiation.

Reducing the maximum permissible limit of 100 millirem per year to members of the public would create a serious hardship for medical facilities and would require a considerable expenditure of healthcare funds to reduce exposures further or would require considerable increased hospitalization for therapy patients in order to prevent exposure from therapeutic radiopharmaceuticals to family members. Some procedures that utilize therapeutic radiopharmaceuticals and have routinely been performed on an out-patient basis would now require hospitalization, not for medical but for regulatory purposes. Enforced hospitalization would significantly increase the cost of medical care and could result in some patients not being able to receive that care.

Approval of this petition would not be in the best interest of the public. This petition should be denied.

Sincerely yours,



Richard J. Vetter, Ph.D., CHP
Radiation Safety Officer

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