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Radiation Safety

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OFFICE OF RADIATION SAFETY
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August 23, 1994

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

Attn: Docketing and Service Branch

Reference: Proposed Rule, Criteria for the Release of Patients Administered Radioactive Material

We appreciate this opportunity to comment on the proposed rule regarding the criteria for release of patients who have been administered radioactive material.

Mayo Foundation does not support the proposed rule on the criteria for release of patients, changing the current 5 mR/h @ 1 meter or 30 millicuries (10CFR35.75) to a calculational methodology determining the total exposure to the maximally exposed individual. A review of the literature will reveal that current practice for release of patients do not result in individual members of the public receiving more than 100 mrem from exposure to a single patient. The additional requirements will not decrease doses further, but only adds to the cost of treatment. The assumption that dose to members of the population from a patient containing radioactive materials can be calculated with any accuracy or precision is false considering the uncertainty associated with the movement of treated patients and the time they spend near members of the public including family members.

This rule increases regulatory requirements without a concomitant increase in safety; therefore, the costs outweigh any benefit, perceived or real. We suggest that the current rule is adequate and that the proposed rule be withdrawn.

Sincerely,



Claire E. Bender, MD
Chair,
Radiation Safety Committee