

DOCKET NUMBER
PROPOSED RULE

PR-19,20,30 et al.
(50 FR 51992)

(166)

AA 38-2
PDR

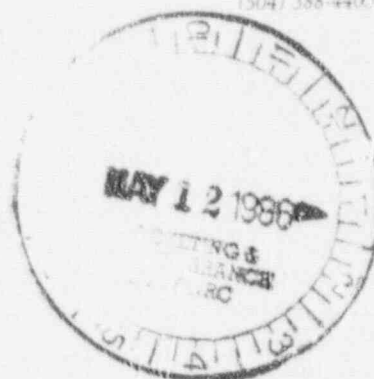


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Radiation Safety Office
East Fraternity Circle

(504) 388-4400

May 9, 1986



Attn: Docketing and Service Branch

Subject: Comments on Standards for Protection Against
Radiation Federal Register Vol. 51, No. 6 January 9, 1986.

Gentlemen:

I would first like to compliment the members who worked on the revision to Part 20. The willingness to meet with members of the health physics profession and to solicit their suggestions was commendable. In general I like the proposed changes in that the limits are based on better science than the current Part 20.

The following are specific comments, suggestion and questions:

- 20.204f: Allowing for delay in reporting exposure assessments will reduce unnecessary reporting. Those reported, although subject to significant error, will have a higher degree of accuracy. This is a good revision.
- 20.205b(5): The requirement of calculating dose equivalent and committed dose and reporting to individuals on an annual basis appears to be unduly burdensome. I suggest that licensee must have action points for the analytical technique used which if not exceeded would result in an annual dose of less than 3 Rem and a committed dose of less than 5 Rem. If these are exceeded then annual dose and committed dose would be computed. It has been my experience that reporting dose to individuals annually is of little value, I suggest continuation of present regulation of reporting as requested and any over exposure.
- 20.205b(6): I believe that individuals should be given general information concerning dose and dose commitment; however, I see little to be gained by required specific training particularly as to uncertainty.
- 20.203(a): I like the designation of declared pregnant woman. The pregnant woman must assume some responsibility for protecting the fetus.

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- 20.905b: In research institutions numerous small shipments of, in many cases short half-life, materials are received. Even if the entire contents leaked during shipment the consequence in my judgement would be minimal. Under an ALARA philosophy I believe there are more producted ways to used limited manpower other than monitoring shipments. Suggest continue with present regulations. Has contaminated or leaking shipments occurred frequently and has it resulted in any significant exposure?
- 20.1003b: Suggest this be expanded to include excreta and milk from animals undergoing diagnosis or therapy with radioactive materials.
- 20.1005a(2): Suggest this be expanded to include excreta and bedding.

L. Max Scott

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LMS:agl