

HARVARD MEDICAL SCHOOL

DEPARTMENT OF RADIATION THERAPY  
DIVISION OF PHYSICS



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PROPOSED RULE PR - *Miss. Notice*  
*Reg. Guide*

15 February 1978



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

Att: Docketing and Service Section

Re: REGULATORY GUIDE 8.18

Dear Sir/Madam:

In general I believe the referenced Guide to be reasonable, well written and needed. I have a few comments which I offer for your consideration:

1. Section 1: Add g. Administrative direction to ensure that any purchases of radioactive material will be processed and received only through the Radiation Safety Office.
2. Section 2.1 (1): Management should provide necessary personnel not only to establish program requirements, but also to carry out the program.
3. Section 3.1.4a...areas where measureable airborne concentrations.... "Breathable concentrations" is meaningless unless there are some concentrations which are not breathable.
4. Section 3.2c: The last sentence indicates an aggressive policy to increase exposure to a group of individuals. It would be better to simply state that therapy facilities and operating procedures should be designed to maintain occupational exposures ALARA.

Thank you for the opportunity to comment.

Sincerely,

Kenneth R. Kase, Ph.D.

KRK:dh

2/22/78

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