

Colt Industries



PROJECT NUMBER PR-19,20,30 et al. (23)
PROPOSED RULE (50 FR 51992)

DOCKETED
USNRC

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Beloit, Wisconsin 53511
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24 March 1986

OFFICE OF
DOCKETING & SERVICE
BRANCH

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

Attention: Docketing and Service Branch

Reference: Federal Register, Vol 51, No. 6 (10CFR19 et al)

Gentlemen:

I favor the revision of subject standards as presented in Vol 51, No. 6 of the Federal Register. However, there seems to me to be an area wherein the standards are silent.

That area deals with the interface of licensees regarding personnel, who are monitored for occupational purposes, and said personnel when they receive exposures for medical purposes (both internal and external). For such personnel, it is entirely possible that they could inadvertently exceed their allowable occupational dose since medical facilities are not required to ascertain whether or not monitored personnel are being examined.

As an occupational user of isotope sources for numerous years, I feel the Commission should require medical facilities, under Part 20, to issue reports (NRC Form 5) to monitored personnel for inclusion in their employers records of occupational exposure. Not to do so seems to violate the ALARA concept put forth by the Commission.

This is of particular interest to me, due to the increased use of X Rays and Radioisotopes by medical facilities for diagnostic purposes. I do not feel that current policy on this matter is in consonance with the ALARA concept which I wholeheartedly endorse.

Also, Revision 2nd Regulatory Guide 10.6 states that the maximum time for exchange of film badges is monthly. In a facility such as ours, where a radiographer will typically receive less than 10 mR per month, changing film badges this frequently results in a reported dose of 0 mR due to the sensitivity of the film in the badge. Would it not be more prudent, under 10CFR34.33 to give special exemption to that maximum frequency of

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DS: [initials]
add: J. Anna Becker, 9604 MNB
Robert E. Alexander, 113055
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A division of the Colt Industries Operating Corp.

Approved by [signature]

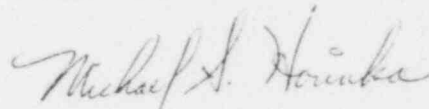
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one month, so that accurate dose determinations can be made. I am not proposing an open ended period, rather an extension to bi-monthly or quarterly exchanges of film badges for facilities who by proven record have very minimal personnel exposures. Perhaps, in lieu of such an exemption, Part 20 could be ammended to require recording the highest dose as determined from the film badge reports and monthly dosimeter reports. Realizing that the film badge has an inherently better accuracy than the pocket dosimeter, I would prefer to see the extension of the exchange period.

Thank you for this opportunity to comment on the proposed rule changes.

Sincerely,

A handwritten signature in cursive script, reading "Michael S. Horinka".

Michael S. Horinka
Radiation Safety Officer

MSH/mlg