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 Curran, Brain Allen, Mary
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Draft Regulatory Guide: Release of Patients Administered Radioactive Material

Comment On: NRC-2023-0086-0001

Draft Regulatory Guide: Release of Patients Administered Radioactive Material; Extension of Comment Period

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Submitter Information

Name: Billy Cox / Health Physicist

Address:

Seabrook, NH, 03874

Email: billycox58@gmail.com

Phone: 6037608227

General Comment

Moving to an exposure scenario using 100% occupancy is not realistic and it is not risk informed. This akin to disposal site scenario where the probability of human intrusion occurs the very day after active institutional controls are removed. It doesn't matter that this is only guidance as my 44 years of experience working for various licensees is that guidance eventually always takes on the form of regulation, especially when it is cited in an NOV. The current 25% occupancy is far more realistic and there is no reason to believe it significantly underestimates caregiver doses. The fact is that some patients do not follow the rules and this change to 100% occupancy won't fix that. The majority of the patients do follow the rules and the current scenario adequately bounds the risk to caregivers. Holding patients longer than currently allowed/required will only result in higher costs and additional trauma to the patient. Let these people go home to a far more comfortable and hospitable place and maintain some dignity at what a fair percentage of the time may be their last year or two of life.