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Submitter Information

Name: Tianliang Gu

Address:

Houston, TX, 77030

Email: tianliang.gu@uth.tmc.edu

Phone: 713-500-7777

General Comment

Table 1. has a 8.6 mCi threshold for I131 release. This will cause much unnecessary work for hospitals administrating I131. Version 1 of the NRC regulatory guide 8.39 applies an occupancy of 1/4 to set the threshold at 33 mCi, which has been used by hospitals for years. We know that the calculation is based on a point source model at 1 meter. In reality it is almost impossible for someone to be close to the patient within 1 meter for the whole life of I131 to justify the use of an occupancy factor of 1 to reach a threshold of 8.6 mCi. The model does not include patient voiding either, which would clear I131 inside the patient rapidly. The 33 mCi threshold used in Version 1 is conservative enough. Adjusting it to 8.6 mCi will not improve the public radiation safety while increasing unnecessary works for any hospital administrating I131. I would recommend keep the I131 release threshold at 33 mCi in Table 1. A commend might be added stating a realistic occupancy factor of 1/4 is applied. Thank you.