

9 Twin Orchard Drive  
Oswego, NY 13126  
November 20, 2024

Secretary, U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001  
ATTN: Rulemakings and Adjudications Staff

“Although radiation affects different people in different ways, it is generally believed that humans exposed to about 500 rem of radiation all at once will likely die without medical treatment. Similarly, a single dose of 100 rem may cause a person to experience nausea or skin reddening (although recovery is likely), and about 25 rem can cause temporary sterility in men.”<sup>1</sup>

One outage at the plant, we replaced all 5 loops of reactor recirculation system piping. (BWR plant) I, and others like me working as Drywell Coordinators, worked 7-12s plus a little more for shift turnover. The outage went a little more than 365 days. I do not believe that I exceeded any radiation guidelines the whole time I worked that outage.

Some years later, I had the lens of each of my eyes replaced. I do not claim this eye repair was related to working in a Radiation area. I do not know. But I also do not claim it is not related, either. As a result, though, I am particularly sensitive with people telling me it is alright for me to receive good (large) amounts of radiation. And I think this is what is happening in Subpart B – Technology-Inclusive Safety Requirements where, in section 53.210(a) and (b), the number 25 Rem is used.

I would like to see the “25 Rem” removed from both places. A replacement value of 5 Rem seems, to me, to be much more acceptable.

Thank you,  
  
Tom Gurdziel

*Adv. Reactor, Rule 53 Thoughts (Comments Tom #5)*

<sup>1</sup> The reference is from: Home > About NRC > Radiation Protection > Radiation and its Health Effects > High Radiation Doses (on the US NRC website)

Attach.

PATIENT LENS IMPLANT  
IDENTIFICATION CARD

ACRY<sup>Sof</sup>\*  
ASPHERIC  
UV Absorbing IOL

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Fort Worth, Texas 76134-2099  
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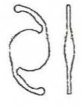
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MODEL: SA60WF POWER: **22.0 D**  
LENGTH( $\emptyset_T$ ): 13.0mm  
OPTIC( $\emptyset_B$ ): 6.0mm  
SN 12486910 078

*left* UV

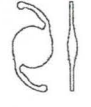


DOS: 12/15/16 Pt.ID: 69104  
Name: **GURDZIEL, THOMAS J.**  
DOB: 02/13/44 Age: 72 Sex: M  
Surgeon: SPITZER, STEPHEN

MODEL: SA60WF POWER: **22.5 D**  
LENGTH( $\emptyset_T$ ): 13.0mm  
OPTIC( $\emptyset_B$ ): 6.0mm

SN 12486934 049

UV



DATE: \_\_\_\_\_ EYE: L \_\_\_\_\_ R \_\_\_\_\_  
PATIENT: \_\_\_\_\_

DOS: 12/01/16 Pt.ID: 69104  
Name: **GURDZIEL, THOMAS J.**  
DOB: 02/13/44 Age: 72 Sex: M  
Surgeon: SPITZER, STEPHEN

