

DOCKET NUMBER  
PETITION RULE PRM 35-15  
(64FR45907)

DOCKETED  
USNRC

Date: October 30, 1999  
To: Nuclear Regulatory Commission  
Re: Petition for Rulemaking Docket No. PRM 35-15

'99 NOV -2 P4:30

The Petition for rulemaking by Jeffrey Angel should be approved. A device that eliminates hand held injections of radionuclides, thereby lowering radiation exposure rates is more than enough justification for the petition. I have been a Nuclear Medicine Technologist for approximately 3 years. The majority of my exposure occurs during the injection process. This device will make my chosen profession safer. Unless this device is mandated, my employer and many others would not spend the money necessary to protect us. They barely want to spend the money on traditional syringe shields.

I've read the petition to deny by David Close, CHP. It is my belief that he misinterprets 20.1101 and the ALARA mandates contained therein. 20.1101 does not go to the issue of maximum permissible limits, rather, it deals with radiation protection controls that should be employed to keep occupational dose as low as reasonably achievable. It does not say engineering controls that keep you under maximum permissible levels. It says Reasonably Achievable. Lower occupational dose rates are achievable with this type of device. He also argues that the vast majority of nuclear medicine personnel receive between 5 and 10% of the permissible limits. As a physicist he should be well aware that there is very poor compliance with external monitoring devices being worn and the true exposure rates are unknown. How many reports has he reviewed where the deep dose exceeds the dose to the extremities? This is only possible when the personnel have failed to wear their ring badges. I may not be a physicist, but I have learned in school that when it comes to radiation, that lower is better. Why would he be opposed to a device that lowers radiation exposure rates? He argues that the additional cost of this device is not justified, but we do not even know how much this device costs. Also, what price or cost should be placed on my health? It is my belief that my job should be made as safe as possible, especially when it comes to radiation and inherently unknown risks that it imposes. I intend to work in this field for many years and would hope that I only receive 1-2% of the permissible levels and not the 5-10%. I have often wondered how efficient these badges are in accurately measuring exposure rates.

Thank you for considering this comment.  
This petition should be approved.

Sincerely,  
Amy O'Quinn, CNMT