

NRCREP - NUREG-1556 Volume 9 Rev 2 Comments - Michigan

From: "Robert Skowronek" <skowronb@michigan.gov>
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Date: 09/07/2007 11:58 AM
Subject: NUREG-1556 Volume 9 Rev 2 Comments - Michigan

8/2/07
 72 FR 42442

Our comments are attached. If we can be of additional assistance, please contact me.

Robert D. Skowronek, Chief
 Radioactive Materials Unit
 Radiological Protection Section
 Waste and Hazardous Materials Division
 Michigan Department of Environmental Quality
 Telephone: 517-241-1253

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STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING



STEVEN E. CHESTER
DIRECTOR

September 7, 2007

Mr. Michael T. Lesar, Chief
Rulemakings, Directives, and Editing Branch
Division of Administrative Services
Office of Administration
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Dear Mr. Lesar:

We appreciate the opportunity to review and comment on the draft NUREG-1556, Volume 9, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Medical Use Licenses."

Comments

Page 8-37, "8.16 Facility Diagram." Patients administered F-18 fluorodeoxyglucose (FDG) are typically kept in a "quiet room" for an hour because the diagnostic procedure requires the patient to remain still to make sure that FDG uptake in normal muscles is as low as possible. The location of "quiet rooms" and adjacent areas should be specifically mentioned in the text.

Page 8-55, "8.23 Occupational Dose." Replace the link to NIST, "<http://ts.nist.gov/ts/htdocs/210/214/scopes/programs.htm>" with "<http://ts.nist.gov/Standards/scopes/programs.htm>"

Page 8-73, "8.37 Mobile Medical Service" and "Appendix V: Guidance for Mobile Medical Services." Some mobile positron emission tomography (PET) services inject the patient in their van but have the patient wait in a quiet room in each facility. A shielding evaluation for these quiet rooms needs to be performed to determine if additional shielding is required to meet public dose limits for adjacent occupants.

Appendix CC, "List of Documents Considered in Development of this NUREG." Many of these documents have been revised by their issuing agencies.

- NCRP Report No. 37, "Precautions in the Management of Patients Who Have Received Therapeutic Amounts of Radionuclides, 1970" was replaced by NCRP Report No. 155, "Management of Radionuclide Therapy Patients" in May 2007. NCRP Report No. 37 is also cited on pages 8-78, U-1, and U-15.
- NCRP Report No. 71, "Operational Radiation Safety – Training, 1983" was replaced by NCRP Report No. 134, "Operational Radiation Safety Training" in October 2000.

- ICRP Report No. 26, "Recommendations of the International Commission on Radiological Protection, 1977" was replaced by ICRP Publication 60, "1990 Recommendations of the International Commission on Radiological Protection" in April 1991. ICRP Publication 103, "Recommendations of the International Commission on Radiological Protection," scheduled to be issued in October 2007, will update ICRP Publication 60. ICRP Report No. 26 is also cited on page M-4.
- ICRP Report No. 35, "General Principles of Monitoring for Radiation Protection of Workers, 1982" was replaced by ICRP Publication 75, "General Principles for the Radiation Protection of Workers," in November 1997.
- ICRP Publication No. 53, "Radiation Dose to Patients from Radiopharmaceuticals, 1987" was updated by ICRP Publication 80, "Radiation Dose to Patients from Radiopharmaceuticals" in April 2000. ICRP Pub. No. 53 is also cited on page U-22.
- ICRP Publication 54, "Individual Monitoring for Intake of Radionuclides by Workers: Design and Interpretation, 1987" was replaced by ICRP Publication 78, "Individual Monitoring for Internal Exposure of Workers" in October 1998.
- ANSI N13.6-1966 (R1989), "Practice for Occupational Radiation Exposure Records Systems" was revised in 1999.
- ANSI N14.5-1987, "Leakage Tests on Packages for Shipment of Radioactive Materials" was revised in 1997 and renamed ANSI N14.5-1997, "Radioactive Materials - Leakage Tests on Packages for Shipment."
- ANSI N42.13-1986 (R1993), "Calibration and Usage of Dose Calibrator Ionization Chambers for the Assay of Radionuclides" was revised in 2004.
- ANSI N42.15-1990, "Performance Verification of Liquid Scintillation Counting Systems" was revised in 1997 and renamed ANSI N42.15-1997, "Check Sources for and Verification of Liquid-Scintillation Counting Systems."
- ANSI N42.17A-1989, "Performance Specifications for Health Physics Instrumentation-Portable Instrumentation for Use in Normal Environmental Conditions" was revised in 2003.
- ANSI N322-1977, "Inspection And Test Specifications For Direct And Indirect Reading Quartz Fiber Pocket Dosimeters" was revised in 1997 and renamed ANSI N322-1997, "Inspection, Test, Construction, and Performance Requirements for Direct Reading Electrostatic/Electroscope Type Dosimeters." ANSI N322 is also cited on pages 8-53 and 8-55.

Mr. Michael T. Lesar

Page 3

September 7, 2007

Typing Errata

- Replace "superceded" with "superseded" on pages iv, 11-2, CC-3, CC-4, and CC-5.
- Replace "Mbq" with "MBq" on page 1-11.
- Replace "cycletrons" with "cyclotrons" on page 8-8.
- Replace "speciality" with "specialty" on pages 8-21, 8-23, C-9, and E-10.
- Replace "alliquot" with "aliquot" on page 8-44.
- Replace "radioidide" with "radioiodide" on page 8-47.
- Replace "radiopharamaceuticals" with "radiopharmaceuticals" on page 8-57.
- Replace "CRF" with "CFR" on page 8-74.
- Replace "mci" with "mCi" on page 8-81.
- Replace "sterotactic" with "stereotactic" on page B-8.
- Replace "Pysicist" with "Physicist" on page B-9.
- Replace "adminstration" with "administration" on pages B-21 and B-24.
- Replace "sulphur" with "sulfur" on page U-10.

If we can be of additional assistance, please contact me.

Sincerely,



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RDS:JK