

7/11/2011

76 FR 40755

**PUBLIC SUBMISSION**

(5)

As of: August 16, 2011  
 Received: August 15, 2011  
 Status: Pending Post  
 Tracking No. 80ee1070  
 Comments Due: August 19, 2011  
 Submission Type: Web

**Docket:** NRC-2009-0279

Potential Changes to Radiation Protection Regulations; Solicitation of Public Comment

**Comment On:** NRC-2009-0279-0037

Impact of Reduced Dose Limits on NRC Licensed Activities; Solicitation of Public Comment

**Document:** NRC-2009-0279-DRAFT-0040

Comment on FR Doc # 2011-17308

**Submitter Information****Name:** Kathryn Pryor**Address:**

PO Box 999,  
 MSIN J2-40  
 Richland, WA, 99352

**Submitter's Representative:** President, HPS**Organization:** Health Physics Society

RECEIVED

2011 AUG 16 PM 12:45

RULES AND DIRECTIVES

**General Comment**

See attached file(s)

**Attachments**

Comments on NRC Dose Limits Guidance - 08-12-11

SUNSI Review Complete  
 Template-ADM-013

E-REDS=ADM-03  
 Add = T. Pryor (tab2)



# HEALTH PHYSICS SOCIETY

---

*Specialists in Radiation Safety*

August 12, 2011

Cindy K. Bladey  
Chief, Rules, Announcements and Directives Branch (RADB)  
Division of Administrative Services, Office of Administration  
Mail Stop: TWB-05-B01M  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

**KATHRYN H. PRYOR, CHP**  
**President**

P.O. Box 999, MSIN J2-40  
Richland, WA 99352  
W: (509) 371-7888  
M: (509) 521-2930  
Email: [kathy.pryor@pnrl.gov](mailto:kathy.pryor@pnrl.gov)

Attn: Rulemaking and Adjudications Staff

Subject: Docket ID NRC-2009-0279 - Impact of Reduced Dose Limits on NRC Licensed Activities;  
Solicitation of Public Comment

Dear Ms. Bladey:

The Health Physics Society<sup>1</sup> (HPS) is a professional organization whose mission is to promote excellence in the science and practice of radiation safety. The HPS appreciates the opportunity to respond to the solicitation of public comments to support revision of NUREG/CR-6112, *Impact of Reduced Dose Limits on NRC Licensed Activities* (May 1995), regarding potential alignment of the current radiation protection regulations with ICRP Publication 103.

The HPS believes that current occupational radiation-safety standards and regulations are sound, and have been adequately protective of radiation workers since the mid-1950s. This position is based on consideration of the following:

1. Since the 1920s there has been a public and independent system consisting of scientific committees, scientific organizations, and regulatory authorities/agencies for recommending and establishing basic radiation-safety standards at the international and national level.

---

<sup>1</sup> The Health Physics Society is a nonprofit scientific professional organization whose mission is to promote the practice of radiation safety. Since its formation in 1956, the Society has grown to approximately 5,000 scientists, physicians, engineers, lawyers, and other professionals representing academia, industry, government, national laboratories, the department of defense, and other organizations. Society activities include encouraging research in radiation science, developing standards, and disseminating radiation safety information. Society members are involved in understanding, evaluating, and controlling the potential risks from radiation relative to the benefits. Official position statements are prepared and adopted in accordance with standard policies and procedures of the Society.

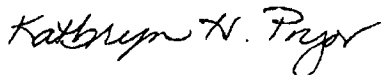
2. Dose limits represent an acceptable level of potential risk and do not represent a level that will necessarily be unsafe if they are exceeded.
3. The reduction of individual dose limits is not evidence the earlier dose limits were inadequate.
4. Average doses received by radiation workers have been, and continue to be, below the individual dose limits existent at the time.
5. The most reliable studies of the effects of radiation exposure at the low levels received by occupational workers have not been able to detect adverse health effects associated with lifetime exposures smaller than approximately 0.1 Sv.

The HPS believes that the current dose limits of 50 mSv/y to occupationally exposed workers and 5 mSv/y to declared pregnant workers are adequately protective. Radiation safety standards have included provisions for incorporating the philosophy of As Low As Reasonably Achievable (ALARA) into work practices since the mid-1950s. The application of ALARA has served to lower occupational doses received by workers in the US without the need for reducing the regulatory dose limits.

The HPS has recently adopted a position that SI units should be used exclusively when expressing radiological quantities. The current events at the Fukushima Daiichi nuclear power station have underscored the need for expression of radiological quantities in a common set of units. If the NRC decides to revise the current radiation protection regulations, this would be an opportune time to consider adoption of exclusive use of SI units for radiological quantities.

If you have any questions regarding these comments, please feel free to contact me at 509-371-7888 or [kathy.pryor@pnnl.gov](mailto:kathy.pryor@pnnl.gov).

Sincerely,



Kathryn H. Pryor, CHP  
President

cc: Brett Burk