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7/11/2011  
76 FR 40755  
(9)

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2011 07 22 PM 12:58

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SUNSI Review Complete  
Template = ADM-013

ERIDS = ADM-03  
Cell = T. Brock (Tab 2)

Opportunity to Comment on  
"Impact of Reduced Dose Limits on NRC Licensed Activities"  
Docket ID NRC-2009-0279

The State of Washington cannot find justification to change the existing regulatory dose limits to the ICRP publication 103 limits at this time. We do not see a proven scientific reason to change the limits when put in to a practical regulatory framework. It is not specified how many deaths or cancers will be prevented with these lower limits.

The State of Washington thanks you for the opportunity to comment on this document.

A. Changes to the current occupational dose limit of 50 mSv per year (5 Rem per year):

While suggested changes would certainly be in accord with the ALARA concept, we note that the ALARA concept and requirements are already in place. Since there is no statistical justification at this time for further reducing the dose limits, we agree with the Commission that the current regulatory framework continues to provide adequate protection for radiation workers, members of the public, and the environment.

B. Changes to the current dose limit for declared pregnant workers of 5mSv (0.50 Rem):

While none of the documentation we have been able to access actually gives a number for the (probably) proposed reduction, we can only speculate that perhaps 1mSv would be the new limit, in order to correspond with current dose limits to members of the public. The only possible negative effect we can see of this proposal would be that some radiation workers may need to cease activities involving exposure sooner in their pregnancy than is currently necessary.

C. An increase or decrease in collective worker dose (person-mSv):

Should these proposed new limits actually decrease the collective worker dose than we would be in favor of them. Data to support this conclusion is not available now.

D. The need for expanded exposure control efforts:

With the possible exception (medically) of interventional physicians (radiologists and cardiologists) we see no need at this time for expanded exposure control efforts.

We would like to know, is there is any federal body that can speak with a single voice when proposing a comprehensive standard regulated by multiple entities?