

PUBLIC SUBMISSION

As of: July 24, 2012 Received: July 20, 2012 Status: Pending_Post Tracking No. 810a84ba Comments Due: July 20, 2012 Submission Type: Web

Docket: NRC-2012-0133

NRC Form 5, "Occupational Dose Record for a Monitoring Period"

Comment On: NRC-2012-0133-0001

NRC Form 5, Occupational Dose Record for a Monitoring Period

Document: NRC-2012-0133-DRAFT-0003

Comment on FR Doc # 2012-14872

Submitter Information

Name: Randal Cords**Address:**

rcords@mirion.com

Irvine, CA, 92614

Submitter's Representative: Randal Cords**Organization:** Mirion Technologies (GDS) Inc.

77 FR 36583

6/19/2012

①

General Comment

Mirion Technologies (GDS) Inc. is a NVLAP Accredited Dosimetry provider. We provide NRC Form 5 equivalent reports to many of our clients, as well as data in REIRS format.

We do provide for automatic calculation of EDE for conditions applicable to "Using Dosimeter(s) While Wearing an Apron during Medical X-Ray Procedures". Currently when EDE calculations for external sources are performed for individuals, we include the EDE in the comments section of the form 5 report.

We do believe that the form 5 needs to be changed to properly document the EDEX. But there is a general practice of performing EDE calculation without assurance that the monitoring is performed correctly. The licensee is responsible for this assurance, not the Dosimetry provider.

We have strict requirements for two badge EDE calculations that both the dosimeters must be received for processing together, and that the Collar badge would be worn on the collar. When the two badges are not returned together, it is assumed that the badges were not properly used for monitoring. If the badges are returned separately or the under the shield badge reads highest, we rely on our client to perform an investigation and assign an appropriate dose.

We are concerned that the instruction should provide appropriately strict guidance for what values are included in the EDEX for the year.

Any monitoring period where the EDE is not calculated, the collar DDE should be used in the accumulation of EDEX.

Current guidance is that the EDE need not be calculated until the individual exceeds 25% of the Annual Limit. If the shielding is provided the effective dose is reduced, the EDEX should be calculated and recorded in addition to the DDE. The calculation should be done and reported irrelevant to the % of limit. Understanding that the EDEX is not relevant if the Limit is not exceeded.

SUNSI Review Complete

Template = ADM-013

E-R105 = ADM-03

Add = D. Lewis (DEL1)

<https://www.fdms.gov/fdms-web-agency/component/contentstreamer?objectId=09000064...> 07/24/2012