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Docket: NRC-2008-0175

Training Requirements for Experienced Radiation Safety Officers and Authorized Medical Physicists

Comment On: NRC-2008-0175-0017

Medical Use of Byproduct Material - Medical Event Definitions, Training and Experience, and Clarifying Amendments

Document: NRC-2008-0175-DRAFT-0026

Comment on FR Doc # 2014-16753

Submitter Information

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General Comment

I'm having difficulty understanding how the following ME definition would be evaluated by clinics who use a nomogram-based approach to "pre-planning", in which case there is no pre-implant dose distribution:

"for intra-target normal structures, the maximum absorbed dose to any 5 contiguous cubic centimeters of tissue exceeds 150 percent of the dose the tissue would have received based on the approved pre-implant dose distribution."