

SUNSI Review  
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ADD: Jazel Parks,  
Harriet Karagiannis

# PUBLIC SUBMISSION

COMMENT (13)  
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**Docket:** NRC-2019-0154

Release of Patients Administered Radioactive Material

**Comment On:** NRC-2019-0154-0003

Release of Patients Administered Radioactive Material; Extension of comment period

**Document:** NRC-2019-0154-DRAFT-0014

Comment on FR Doc # 2019-17060

## Submitter Information

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**Government Agency Type:** State

**Government Agency:** Wisconsin Department of Health Services

## General Comment

See attached file(s)

## Attachments

STC-19-049 Wisconsin Comments

Tony Evers  
Governor



**DIVISION OF PUBLIC HEALTH**

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Andrea Palm  
Secretary

**State of Wisconsin**  
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September 26, 2019

Office of Administration  
Mail Stop: TWFN-7A06  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

**RE: U.S. NUCLEAR REGULATORY COMMISSION FEDERAL REGISTER NOTICE  
DRAFT REGULATORY GUIDE-8057 "RELEASE OF PATIENTS ADMINISTERED  
RADIOACTIVE" (STC-19-049)**

Dear Mr. Daibes,

The State of Wisconsin, Radioactive Materials Program has reviewed the above document and submits the comment below:

The footnote on page 1 says that the 500 mrem patient release limit is a "per treatment" release, not an annual release. This contradicts the NRC's position described in Regulatory Issue Summary 2008-07 which states "if multiple administrations or applications in a single year are planned, anticipated, or potentially may be required for an individual, the decision about releasing that individual following each of the administrations should, in NRC's view, be based on the cumulative TEDE from all administrations or applications in a given year not exceeding 5 mSv (0.5 rem) for the maximally exposed other individual." What is the radiation safety basis for relaxing the patient release criteria?

Sincerely,

A handwritten signature in black ink, appearing to read "David Reindl".

David Reindl  
Nuclear Engineer  
Radioactive Materials Program  
State of Wisconsin