



HEALTH PHYSICS SOCIETY

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DOCKETED
USNRC

Specialists in Radiation Safety

January 3, 2012 (8:20 am)

December 21, 2011

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

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@pnnl.gov

Attn: Rulemaking and Adjudications Staff

Subject: Docket ID NRC-2010-0292, Proposed Changes to NRC's Consumer Products Policy Statement

Dear Ms. Bladey:

The Health Physics Society (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 on the "Proposed Changes to NRC's Consumer Products Policy Statement."

The HPS has taken the position that standards and regulations for radiation safety of the general public should be based on current scientific consensus represented in recommendations of the International Commission on Radiological Protection (ICRP) and the National Council on Radiation Protection and Measurements (NCRP). The Nuclear Regulatory Commission (NRC) and its predecessor agency (Atomic Energy Commission) issued a policy statement on products containing radioactive materials that are intended for use by the general public. The NRC has periodically reevaluated this policy statement since its issuance. The NRC is now proposing to update this policy statement to include approaches and terminology more consistent with the evolving approach to radiation protection and to recognize relevant legislative and regulatory actions.

The HPS has reviewed the proposed changes to the policy statement and considers the changes reasonable in light of the newer approaches to radiation protection. The HPS has taken the position that justifiable sources of radiation exposure of the public include those that result in an overall net benefit to society. The HPS agrees with the NRC that the use of radioactive materials in specifically approved consumer products provides a benefit to society, that it is unlikely that individuals in the population will receive more than a small fraction of individual dose limits (as

Offices of the Executive Secretary, 1313 Dolley Madison Blvd., Suite 402, McLean, VA 22101
Phone: (703) 790-1745 Fax: (703) 790-2672 Email: hps@burkinc.com Home Page: www.hps.org

Template = SECY-067

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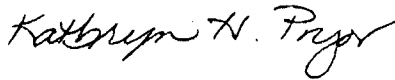
recommended by ICRP and NCRP) from use of radioactive materials in currently approved consumer products, and that the probability of individual doses approaching a level that could cause immediate effects is negligible.

The HPS supports the list of principal considerations for evaluation of new products that contain radioactive materials. We suggest that section IV.10(d) be reworded to replace the term “exposures” with the term “doses” to be consistent with ICRP and NCRP terminology. The NRC should consider quantification of both external doses and internal doses (from inhalation, ingestion and dermal absorption) when evaluating new consumer products.

Thank you again for the opportunity to share our thoughts on the proposed changes to NRC’s policy statement on consumer products.

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

Sincerely,



Kathryn H. Pryor, CHP
President

cc: Brett Burk

ⁱ 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.

PUBLIC SUBMISSION

As of: December 29, 2011
Received: December 21, 2011
Status: Pending_Post
Tracking No. 80f879bd
Comments Due: December 28, 2011
Submission Type: Web

Docket: NRC-2010-0292

Products Intended for Use by the General Public (Consumer Products); Policy Statement

Comment On: NRC-2010-0292-0001

Consumer Product Policy Statement

Document: NRC-2010-0292-DRAFT-0004

Comment on FR Doc # 2011-26581

Submitter Information

Name: Kathryn Pryor

Address:

1313 Dolley Madison Blvd

Suite 402

McLean, VA, 22101

Submitter's Representative: President

Organization: Health Physics Society

General Comment

See attached file(s)

Attachments

Comments on NRC consumer products policy - 12-21-11

Rulemaking Comments

From: Gallagher, Carol
Sent: Thursday, December 29, 2011 3:45 PM
To: Rulemaking Comments
Subject: Comment on Consumer Product Policy Statement
Attachments: NRC-2010-0292-DRAFT-0004.pdf

Attached for docketing is a comment on the above noted policy statement (76 FR 63957; published 10/14/11) that I received via the regulations.gov website on 12/21/11.

Thanks,
Carol