



RADIATION SAFETY OFFICE

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Via E-mail

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Dear Sir/Madame,

RE : Comments on Comments on Draft REGDOC-2.7.3 Radiation Protection Guidelines for Safe Handling of Decedents

Thank you for the opportunity to comment on comments received for Draft REGDOC-2.7.3 Radiation Protection Guidelines for Safe Handling of Decedents.

Generally commenters seem to be of similar viewpoints and could probably function as a collaborative group going forward. I was somewhat surprised to see that the majority of comments came from health-care than death-care professionals – this draft REGDOC seems aimed at death-care professionals. This topic has been of concern to many medical RSOs for a number of years now so maybe the “skewed” response should have been expected after all.

The report or discussion paper submitted by the Quebec Ministry of Health and Social Services seems aimed at health-care and RSOs/Health Physicists, especially with activity limits proposed for many radionuclides. Perhaps this report could form part of a follow-on document aimed at

Medical RSOs/Health Physicists? The report seems to go beyond draft REGDOC-2.7.3 as it delves into diagnostic radionuclides. The four mock scenarios presented seem helpful. My main concern with the Quebec government report is that it seems to recommend implementation of specific regulations vs the draft REGDOC which is more about “small g” guidance. That could be an effect of analyzing the Quebec document written in French by an English-speaker who is not conversant in French.

The suggested values in Table 1 of the Quebec government report may be overly conservative, - using the *RadPro* on-line calculator for F-18, I-131 and Tc-99m to estimate activities giving 0.5 uSv/h at 1m and 25 uSv/h at 1m resulted in higher levels (almost 1.4 to 3 X difference) than those shown in the report. If the values in Table 1 are overly conservative, what is the impact on values through the body of the document? The report states that in the case of transportation of the body or body parts, *PTNS* 2015 must be observed whereas the draft REGDOC provides an exemption (PDF page 16, Section 8 Para 2).

Sincerely,

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Radiation Safety Coordinator

Rad-Pro on-line calculator: <http://www.radprocalculator.com/Gamma.aspx>