



COMMONWEALTH of VIRGINIA

Department of Health

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STATE HEALTH COMMISSIONER

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Radiography Dosimetry Exemption

Virginia Radioactive Materials Program (VRMP) regulation 12VAC5-481-1350 A requires that a radiographer and/or radiographer's assistant wear, on the trunk of the body, a combination of direct reading dosimeter, an alarming ratemeter, and either a film badge, an optically stimulated luminescence (OSL) dosimeter or a thermoluminescent dosimeter (TLD).

It has come to our attention that licensees are authorizing personnel to wear an electronic dosimeter which performs both the direct reading and alarming functions. The Nuclear Regulatory Commission has stated that this is not permissible based upon their interpretation of 10 CFR 34.47(a).

However, the VRMP's regulation and the NRC's interpretation of 10 CFR 34.47(a) is based, in part, on regulatory language that predates the new technology. Therefore, the VRMP is granting an exemption to 12VAC5-481-1350 A for radiography licensees who desire to wear an electronic dosimeter that acts as a direct reading dosimeter and an alarming ratemeter.

If you have any questions regarding the exemption or amendment process, please contact the VRMP at 804-864-8150.

Sincerely,

A handwritten signature in black ink that reads "Michael Welling".

Michael Welling
Director, VRMP