COMMENTS BY REVIEWER Reviewer: Page.... of.... Country/Organization: Japan Health Physics Society Date: 30 May 2014				RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1	After 3.47 (Addition of new paragraphs)	SPECIAL CIRCUMSTANCES 3.#1 In special circumstances, provided that a practice is justified and is designed and conducted according to good practice, and that radiation protection in the practice has been optimized but occupational exposures still remain above the dose limits, and that it can be predicted that reasonable efforts can in due course bring the occupational exposures under the limits, the Regulatory Authority may exceptionally approve a temporary change in a dose limitation. Such a change should be approved only if formally requested by the registrant or licensee, if the Regulatory Authority determines that the practice is still justified and is satisfied that appropriate consultation with the workers concerned has taken place. 3.#2 Should special circumstances exist which require a temporary change in some dose limitation, the registrant or licensee may apply to the Regulatory Authority for such a temporary change. 3.#3 No temporary change in a dose limitation requirement should be made without approval by the Regulatory Authority. 3.#4 The registrant or licensee should, in	In the restoration stage after the nuclear accident, the recovery workers in the accident site are forced to be exposed to relatively high radiation dose. In such situation, a flexible application of dose restrictions for workers should be necessary to carry out the restoration work after accident reasonably practical. It will be essentially important that the skillful workers who have experience of the work in early stage after an accident are allowed to continue the restoration work within a certain period of time. The general principles for the radiation protection of workers in accident and emergency situations have been provided in ICRP Publ. 75, which says: - In accident and emergency situations, doses may exceed the dose limits. (para.60) - If continued exposure is permitted, it would be appropriate for the management, in consultation with the worker, and subject to any requirements of the				

		any application for a temporary change in a dose limitation: (a) describe the special circumstances requiring the temporary change; and (b) provide evidence to demonstrate that: (i) all reasonable efforts have been made to reduce exposures and that protective measures and safety provisions have been optimized; (ii) the relevant employers and workers, through their representatives where appropriate, have been consulted and their agreement obtained on the need for a temporary change and on the conditions of the temporary change; (iii) all reasonable efforts are being made to improve the working conditions to the point where the dose limits specified in para. 3.34 ; and (iv) the monitoring and recording of the exposures of individual workers are sufficient to demonstrate compliance with the relevant requirements of this guide and are sufficient to facilitate the transfer of exposure records between relevant employers. 3.#5 Any temporary change in a dose limitation should: (a) be in accordance with the dose limitation for special circumstances given in para.3.#6; (b) be for a limited period of time; (c) be subject to annual review; (d) not be renewable; and (e) relate to specified work areas. 3.#6 When, in special circumstances, a temporary change in the dose limitation requirements is approved in pursuance with para.3.#1 to para.3.#5: the dose averaging period mentioned in para. 3.34 may exceptionally be up to 10 consecutive years as specified by the Regulatory Authority,	regulatory agency, to establish a formal dose limitation regime to be applied for the remainder of the control period. A temporary dose restriction based pro-rata on the remaining period of time to which the dose limit relates might be appropriate. (para.61) - Consideration also needs to be given to the subsequent management of a worker who as a result of an accident has received a significant exposure but whose total dose for the relevant period has not exceeded the relevant dose limit. In those situations where continuation of normal working practice during the remainder of the period may lead to the total dose exceeding the relevant dose limit, management may decide to change the worker's duties to avoid this happening. While recognizing the legal status that regulatory agencies have given to the dose limits, the Commission recommends that such situations should be dealt with in a flexible manner. (para.62) - The doses received in emergency situations should not compromise the further employment of the worker in work with ionizing radiation. (para.148) The additional text is proposed on the basis of the prescriptions given in Appendix I and Schedule II in				

		and the effective dose for any worker should not exceed 20 mSv per year averaged over this period and should not exceed 50 mSv in any single year, and the circumstances should be reviewed when the dose accumulated by any worker since the start of the extended averaging period reaches 100 mSv.	the Safety Series 115 (previous BSS) regarding the dose limitation in special circumstances.				
2	4.12	The initial phase of a response to a nuclear or radiological emergency is characterized by a lack of information about the event, a scarcity of materials for implementation of protective measures and the need for urgency in implementing protective actions. Therefore, there is little or no scope for applying the optimization process when managing the protection of emergency workers during this initial phase. Efforts should be aimed at reducing any exposures as far as practicable taking into account the difficult conditions of the evolving emergency.	In our experience after the nuclear accident in Fukushima, there was a serious shortage of protective tools.				
3	5.21	Reference levels are generally expressed in terms of annual effective dose ~~to the representative person in the range 1–20 mSv~~. However, reference levels for exposure to radon are expressed in terms of annual average radon concentration in air.	Section 5 describes exposure of workers in existing exposure situations including exposures from remedial action in a contaminated area, ^{222}Rn and ^{220} Rn, and cosmic radiation to aircrew and space crew. However, the dose range 1–20 mSv is the band of reference level for the public.				
4	7.221	Add specific examples of parameters for calculating the equivalent dose to a tissue or organ, or the committed effective dose.	Clarification.				