

Dear Sir or Madam,

The Cremation Association of North America (CANA) appreciates the opportunity to comment on the draft REGDOC-2.7.3: *Radiation Protection Guidelines for Safe Handling of Decedents*. Congratulations on a well researched and practical document that will be useful to Canadian funeral professionals and others. Canada has consistently led our profession in this area, and this latest document continues this tradition.

After reviewing the draft I offer four areas for further consideration:

- 1) These guidelines assume the proactive disclosure by the family that the deceased underwent nuclear medicine procedures. As a practical matter, should crematories acquire Geiger counters and routinely screen bodies prior to cremation as they do with metal detectors seeking medical implants?
- 2) These guidelines reference thoroughly raking the primary chamber post cremation, but do not reference vacuuming, another common practice for removing cremated remains. Was this method explored and tested?
- 3) Should other isotopes be adopted by medical professionals, could funeral professionals apply these guidelines if the radioisotope has a similar timeframe for taking precautions?
- 4) Alkaline Hydrolysis is a distinctly different disposition process and preliminary research conducted by the Mayo Clinic, Rochester, MN USA indicates that encapsulated radioactive treatment (i.e brachytherapy seeds) do not release radiation during the Alkaline Hydrolysis process. It may be advisable to consider alkaline hydrolysis and related timeframes for disposition separately.

Respectfully submitted,

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