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PROPOSED RULE PR-19.20(44FR10388) ⁶

March 5, 1979

Secretary of the Commission
US Nuclear Regulatory Commission
Washington, DC 20555

Subject: PROPOSED RULE CHANGE TO 10CFR20
FEDERAL REGISTER VOL 44, NO. 35
DATED TUESDAY, FEBRUARY 20, 1979

Attention: Docketing and Service Branch



Dear Sir:

The following comments are offered in response to the proposed rule change to 10CFR20.

Comment 1

In light of operating experience and the ICRP-26 recommendations, the deletion of the 5(N-18) rule seems appropriate. However, in accordance with the ICRP-26 recommendations, the NRC should eliminate the quarterly exposure limits. This would give utilities additional operating flexibility and may very well reduce annual man rem exposures. In addition, it would be consistent with the philosophy of regulating only to the degree required.

The 3 rem whole body quarterly limit appears to be an arbitrarily defined limit to help ensure that the annual limit is met. Utilities will probably institute their own administrative limits to ensure compliance with the annual limits and to optimize manpower utilization. However, the utilities should be given the option to exercise their own judgement in these matters. A 3 rem, rather than a 5 rem, quarterly limit would neither provide the NRC with a very powerful tool to ensure compliance with the annual limits nor act as an indicator of possible undesirable conditions.

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Comment 2

The NRC should consider removing the lens of the eyes from the 5 rem/yr limit of 20.101 since there is no reason why this structure should be singled out when such organs as the thyroid and the lungs are not. In addition, ICRP-14 has clearly demonstrated the relative

Acknowledged by card.....

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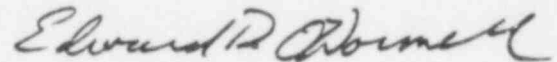
radiological insensitivity of the lens of the eyes. Using a 50 yr r working life, and the 15 Sv (1500 rem) ICRP-26 recommendation, a more appropriate limit would be 30 rem/yr.

Comment 3

Though not part of the proposed rule change, it must be emphasized that the technical basis for the NRDC petition, namely the Mancuso report and the Portsmouth study, have been discredited. In light of this and the ICRP recommendations, a rule making hearing in response to the NRDC petition is unwarranted.

Thank you for this opportunity to comment on the proposed rule change. It is hoped that our comments prove to be useful.

Very truly yours,



EDWARD P O'DONNELL
Chief Engineer
Nuclear Licensing

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