

GAIL D. ADAMS, PH.D.  
RADIOLOGICAL PHYSICIST

O.H. 705-1  
J. Bell

CERTIFIED BY:

AMERICAN BOARD OF RADIOLOGY  
AMERICAN BOARD OF HEALTH PHYSICS

P. O. BOX 391  
OKLAHOMA CITY, OKLAHOMA 73101

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U. S. Nuclear Regulatory Commission  
Secretary of the Commission  
Washington, D. C. 20555

Attention: Docketing and Service Branch

Subject: 20 Feb 1979 Notice of Intent to Amend 10 CFR 19 and 20

Dear Sirs:



I thank you for adding my name to your list of persons notified of specific Commission actions. In the past, my first notice has been received by accident and after comment periods had expired.

I have been Radiation Safety Officer at the University of Oklahoma Health Sciences Center and three on-campus hospitals since January 1965. I act as RSO on a consultant basis to hospitals and other facilities throughout the State of Oklahoma. I do not have responsibility for any installation in which high LET radiation is the major radiation hazard.

It seems to me that 5(N-18) has been seen as a guide in two different contexts. 1) That relating to the radiation worker in the ordinary course of his employment. 2) That relating to any person, though a radiation worker in overbearing probability, at a time of radiation emergency. You argue well to abandon 5(N-18) for the first context. Supervisory personnel, particularly the RSO, needs a guide to employ in the case of a radiation emergency. If not 5(N-18), please do not leave a vacuum. The difficulty then would probably be both technical and legal.

I wish to applaud removal of "permissible". It has been a long-standing joke that "Maximum Permissible Dose" is neither a maximum nor permissible nor a dose.

To note something you already know, I'm sure: it is very difficult to collect the moonlighting portions of occupational radiation histories. Fear (on the part of the worker) is involved, conditions and locations change abruptly, and the worker typically does not see this as a priority matter. We try but I am unsure of the degree of cooperation received.

Yours sincerely,

G. D. Adams, Ph.D.

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