

ENCLOSURE H

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

March 20, 1979

MEMORANDUM FOR: Tom Rehm
FROM: Al Keneke, Acting Director, OPE
FROM: REDUCTION OF RADIOGRAPHY OVEREXPOSURES

As requested, I have reviewed the draft staff paper. The staff has made reasonable adjustments to the rule in response to public comments. I believe the Commission should act favorably on the proposed final rule as a significant step toward reducing the frequency of radiography overexposures.

I do have some concern that the remainder of the program of five actions -- of which this rule is one -- may not be maintaining the rate of implementation that had been expected. I suggest Enclosure G be supplemented by a discussion of the status of the plan of action identifying original as well as present target dates.

In addition, Enclosure D contains a number of points that tend to minimize the urgency of correcting the radiography overexposure situation and to complete the full set of actions;

- The fact that there have been no deaths or loss of limb are not particularly relevant in the context of the generally conservative basis underlying occupational exposure standards.
- As the concern in this case is not for controlling collective dose, but for controlling individual risks, a more significant measure of such risks is the likelihood of overexposure per person at risk, which appears to be several times greater for radiographers than for workers in other exposure categories.
- Whereas Enclosure D tends to play down the importance to the problem of design and equipment defects, the relatively high frequency per capita of radiography overexposures suggests that efforts to improve equipment would be of substantial importance in reducing the rate of such overexposures.

In sum, there is a need to reemphasize the urgency of completing all tasks in the program as expeditiously as possible.

cc: Leonard Bickwit
Sam Chilk

Enclosure "H"

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