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April 20, 1979

PROPOSED RULE PR-19,20(44FR10388) (62)



Nuclear Regulatory Commission
1717 H Street NW
Washington, DC 20005

Re: Change in rules relating to effective radiation on employees
in nuclear plants

Gentlemen:

I enclose a copy of an article in our local newspaper relative to the proposed change in rules relating to exposure of employees in nuclear plants to radiation.

The aspect of the rule that is of particular concern to me is the decision that plant management does not have to obtain the history of radiation exposure of plant workers in their previous employment.

The culpability of the federal government and this includes your agency, in not having required over the past thirty-five years the most meticulous radiation history for every employee and all other personnel exposed to radiation is beyond belief. As one associated with the health care industry, it is inconceivable that with our lack of knowledge of the effects of radiation, we have not compiled an epidemiological history of all those associated with the nuclear industry. As your commission knows full well, you have had to reduce the limits of acceptable radiation already on a number of occasions. My friends involved with radiation therapy in the Boston health care complex are frank to say that we simply do not know what the long range effects will be of low radiation doses. The least we can do is to keep an accurate record of every nuclear worker's health.

Of course, this is going to be expensive for those producing nuclear power and for the government but the expense will be justified many times over in terms of learning what the long range effects of low level radiation are and are not.

Because of the time interval necessary for cancer and other diseases to develop, if we do not keep such records, we are in, effect, playing Russian roulette with a lot of uninformed individuals and, undoubtedly, with the future generations whose genetic components will be affected.

I urge that you not change the rule in question and mandate rules

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Acknowledged.....

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requiring that in the future complete health histories are maintained on all those exposed to nuclear radiation even of low level.

Very truly yours,

BR Sturges

B. R. Sturges

BRS/md

cc: Peter Bradford

Enc.

2353 131

Safe Power official hits rules change on radiation exposure

By JAMES T. KAULL
Journal-Bulletin Energy Writer

Rhode Islanders for Safe Power is objecting to a proposed change by the federal Nuclear Regulatory Commission (NRC) in the requirement for keeping records of power-plant workers' exposure to radiation.

Mrs. Emma Sacco, president of the Rhode Island group, which opposes the planned nuclear plant at Charlestown, said the NRC's proposal is "incredibly callous" and looks like a move, supported by utilities, "to forestall claims for damage caused by workplace radiation."

She said persons objecting to the NRC move should write the commission immediately, because public comments must be received by next Monday.

The rule change referred to by Mrs. Sacco was published Feb. 20 and therefore was not triggered by the accident last month at the Three Mile Island power plant near Harrisburg, Pa.

In that incident, some plant workers evidently received more radiation than they should have under either existing or new rules.

ALTHOUGH THE NRC has actually proposed to further restrict the amount of radiation that plant workers can receive over the course of a year, one provision in

the rule change has drawn the fire of Rhode Islanders for Safe Power:

Because the formula for totaling exposure is being changed, the NRC is deleting a requirement that a plant management must obtain a new worker's previous history of occupational doses, unless he is likely to be receiving more than 5 percent of the allowable standard on his new job.

The plant must keep records of the employee's exposure while he is on the work rolls.

Mrs. Sacco interpreted the proposal to mean that the NRC "plans to stop keeping records of nuclear workers' exposure to occupational radiation."

Although the rules are somewhat complicated, the basic requirement now is that a plant worker may not be exposed to more than 3 rems per quarter or a total 12 rems a year. A rem (roentgen-equivalent, man) is a method of calculating the dose that a human body receives from radiation.

The rule would be changed so that the three-months' limit of 3 rems would remain, but the yearly exposure could not exceed 5 rems.

The NRC proposes to make this change as soon as it can, but also has planned a hearing, at the request of concerned scientists, to study in greater detail the whole matter of occupational exposures.