



The Commonwealth of Massachusetts

Bunker Hill Community College

CHARLESTOWN, MASSACHUSETTS 02129

TELEPHONE: (617) 241-8600

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March 15, 1979

Secretary of the Commission
U. S. Nuclear Regulatory Commission
Docketing and Service Branch
Washington, D.C. 20555



Re: Proposed Rules Changes Amending (10 CFR Parts 19 and 20)
Notices, Instructions, and Reports to Workers:
Inspection Standards for Protection Against Radiation

Dear Sir:

Bunker Hill Community College presently offers accredited training programs in Nuclear Medicine Technology and Diagnostic Radiologic Technology. Both programs incorporate the use of a wide array of energized equipment comparable to that found within the hospital setting. Some 80% of this equipment has been provided to the college through a grant from the Manpower Grants Service, Office of Academic Affairs, Veterans' Administration. Students receive controlled laboratory experiences using this equipment which are designed to acquaint the students with effect on the films produced and dosages of radiation delivered resulting from adjustments of the various controls or the use of accessories pertinent to each piece of equipment. Full awareness of the effects of radiation exposure to both patients and radiation workers is an integral and vital component of the students' training.

Protocols for strict control of student exposure to radiation have been developed within each program which are intentionally more conservative than what would be required to keep student exposure to within presently acceptable limits. The proposed limit for mandating the monitoring of minors 18 years of age or under (any quarterly dose in excess of 1.25% of the annual standards specified in Part 20.010) is a limit we fully endorse and indeed have already incorporated into our protocols for all students irrespective of age.

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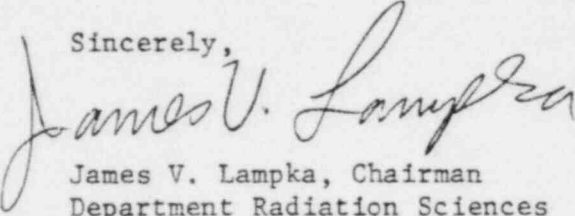
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We attempt to instill in our students the understanding that any exposure to radiation over and above natural background levels is a matter which should be approached seriously and with full knowledge of risks and benefits to be gained by this exposure. Amending the rules as proposed will help to underline the seriousness of the matter to students. We are glad to see these changes proposed.

Sincerely,

James V. Lampka

James V. Lampka, Chairman
Department Radiation Sciences

JVL/lk

cc: Senator Edward Kenedy
House Speaker Thomas P. O'Neil
Martha Phillips, Director
Manpower Grants Service,
Veterans' Administration
Senator Paul Tsongas