



(NRC PUBLIC DOCUMENT ROOM)



DOCKET NUMBER
PROPOSED RULE *PR-Misc Native
Reg. Guide*

Department of Energy
Environmental Measurements Laboratory
376 Hudson Street
New York, New York 10014

May 23, 1979

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

Dear Sir:

I would like to comment on the draft Regulatory Guide for Calculational Models Related to Uranium Milling Operations. One minor point is the use of the quality factor of 10 throughout the report although ICRP Report 26 has definitely adopted 20.

My major comment is the statement that the controlling dose is that to bone from long-lived radon daughters. Doses estimated from measured values of these natural radionuclides in human bone indicate a dose that is about one-fourth of that to bronchial epithelium. The computer model used may show a higher bone dose but a warning should be included that the calculation is not realistic.

Sincerely,

John H. Harley, Director
Environmental Measurements Laboratory

Acknowledged by card. *6/13/79*

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