

RH-905-17

DEPARTMENT OF THE AIR FORCE
HEADQUARTERS UNITED STATES AIR FORCE
BOLLING AFB, DC 20332



AFMSC/SGF/A
BROOKS AFB TX TAS 78235

10 JUN 1980

DOCKET NUMBER PR-20 (21)
PROPOSED RULE (45 FR 18023)



Secretary of the Commission
US Nuclear Regulatory Commission
ATTN: Docketing and Service Branch
Wash DC 20555

Dear Sir

The attached comments on the agency's "Standards for Protection against Radiation; Advance Notice of Proposed Rulemaking," (FR Doc 80-8381), are provided for your consideration in developing specific proposed changes to 10CFR20.

Sincerely

[Signature]
JAMES F. CULVER
Brigadier General, USAF, MC
Deputy Surgeon General for Operations

1 Atch
Comments

Acknowledged by card 6/12/80. mdy...

L-4-1, Pt. 20

8007020 444

Para

Comment

Essential Elements

We agree that the elements outlined in this section are all appropriate for inclusion in a Radiation Protection Standard. However, we have concerns about the specific requirements which may be established for some of these elements. Some of these concerns are addressed in the comments on "areas in Part 20 that need improvement." When specific proposals are made, more detailed comments can be given.

Areas in Part 20 that
need improvement

a(1)

We agree. An explanation should be included as to why the linear, no-threshold assumption of effects was selected. Particular emphasis should be placed on the fact that definitive data for low dose effects does not now exist, nor is it likely that it will exist in the foreseeable future. The statistical risks of incurring the adverse health effects that the numerical standards are established to minimize should be given and put into perspective against common risks of every day life.

a(2)

We are always concerned about setting numerical guides for ALARA. This is because specific numerical values are often misunderstood and applied as absolute limits without regard to other variables which must be considered. Good examples of such misuse are the initiatives by some States to use the Entrance Exposure Guides for diagnostic radiology given in Federal Guidance Report #9 as statutory limits. These actions totally ignore the several factors that affect the validity of such guides, e.g., filter-screen combinations, high kVp vs. low kVp techniques, single or 3-phase power, etc.

b(1)

Agree that exposure limits must address combinations of internal and external emitters, and ICRP recommendations are a reasonable starting point.

b(2)

Consideration should be given to retaining derived limits for concentrations in air and water with "updating" as appropriate.

Para

Comment

These would appear to be more useful in practical application than an annual intake limit, particularly for intermittent, short duration exposures. An annual intake limit in terms of concentration would imply that concentration X in 50 weeks is the same as concentration 50X in 1 week so long as no further exposure occurred during the year. This is not the case for some radioisotopes such as Iodine. Also, compliance with derived concentration limits would appear to be more readily determinable without undue sophistication in instrumentation.

b(3)

We support special provisions for emergency exposures and special situations. We believe that provisions should be made to permit individuals to voluntarily exceed the standards by some predetermined value to save lives, prevent a significant exposure to the general public, or preclude a future serious accident, without jeopardizing their future employability in the radiation industry.

b(4)

Agree--but only so long as ALARA guides do not become de facto limits.

b(5)

While we agree that consideration must be given to the need for limiting exposures of susceptible groups, we are particularly concerned that this paragraph implies that "women in general" or "fertile women" are more susceptible than "men in general" or "fertile men." There is no evidence of a sex-linked difference for somatic effects, and genetic effects were supposedly already considered in selection of the whole body limit. If additional consideration of potential genetic effects is to be made, fertile members of both sexes must be considered.

c(2)

See b(2). Again, derived concentration limits would appear to be more useful since they can normally be directly applied to effluents as a screening tool without resorting to complex environmental models.

c(3)

See b(5).

Para

Comment

f(1)

If SI units are adopted, cross references must be made to existing units. Workers and the public have begun to have some understanding of radiation terms now used. Conversion of units can cause confusion and uncertainty.

f(2)

Any performance standards for health physics measurement should consider not only what is technically achievable, but the purpose for which the measurement is being made, e.g., detection or quantification. Standards for measurements should not be more stringent than appropriate to the purpose for which they are being made.

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of) Docket No. 50-367
)
NORTHERN INDIANA PUBLIC SERVICE) (Construction Permit
COMPANY) Extension)
)
(Bailly Generating Station,) June 30, 1980
Nuclear-1))
_____)

CERTIFICATE OF SERVICE

I hereby certify that a copy of NIPSCO's Objections to Provisional Order Following Special Prehearing Conference was served on the following by deposit in the United States mail, postage prepaid, on this 30th day of June, 1980:

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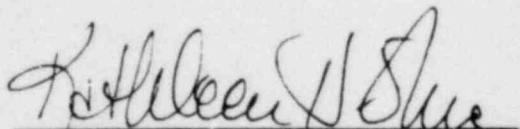
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