



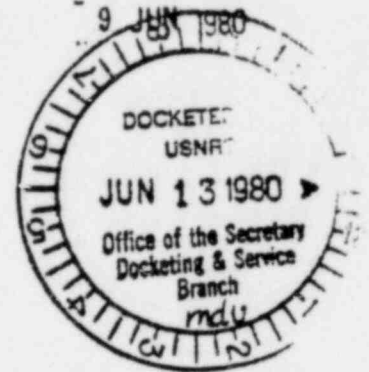
DEPARTMENT OF THE ARMY
OFFICE OF THE SURGEON GENERAL
WASHINGTON, D.C. 20310

REPLY TO
ATTENTION OF

DASG-PSP-E

AGENCY NUMBER
PROPOSED RULE PR-20 (25)
(45 FR 18023)

Secretary of The Commission
US Nuclear Regulatory Commission
ATTN: Docketing and Services Branch
Washington, DC 20555



Gentlemen:

Reference is made to your Advance Notice of Proposed Rulemaking; Standards for Protection Against Radiation, published in the Federal Register of March 20, 1980.

We agree with the objectives of the proposed revised radiation protection standards as stated in the section entitled, "Function of Radiation Protection Standards".

Under the section "Essential Elements of the Radiation Protection Standards", we generally agree with the stated items for consideration. Specific comments are as follows:

- If items (1) and (2) of the derived principles are to be incorporated, specific guidance must be given to licensees to assure that uniform procedures are used throughout the country.

- Paragraph b(2): Specific consideration should be given to exposure of the embryo/fetus and minors; however, women in general and fertile women should not be considered as requiring special provisions.

- Paragraph b(3): Strongly agree with controls for these individuals.

- Paragraph d: Add a section addressing minimum qualification requirements for radiation protection personnel and users.

Under the section "Areas in Part 20 That Need Improvement", the following comments are provided:

- Paragraph b(5): We are not aware of any scientific evidence that would indicate special exposure provisions for women in general or for fertile women. Recommend that special provisions for the embryo/fetus and for minors be incorporated.

2-4-1, Pt. 20

Acknowledged by card 6/13/80.mdu.

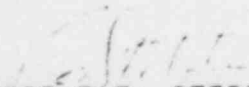
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- Paragraph b(6): Strongly agree with controls for these individuals.
- Paragraph c(3): See comment for paragraph b(5), above.
- Paragraph d(1): Recommend that this also address qualifications of users and radiation protection personnel.

In general, implementation of 10 CFR 20 should be left sufficiently flexible to allow radiation protection programs to be adapted to local situations.

Sincerely,


GEORGE E.T. STEBBING, M.D.
Colonel, MC
Chief, Preventive Medicine
Consultants Division