

Yale University
UNIVERSITY HEALTH SERVICES
HEALTH PHYSICS DIVISION

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June 11, 1980

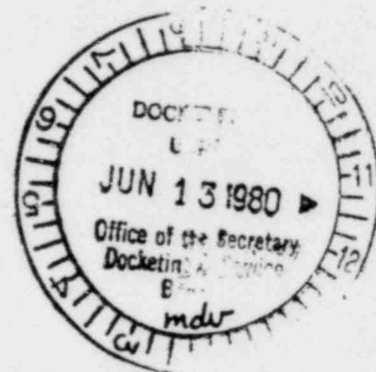
314 Wright Nuclear Structure
Laboratory, West
260 Whitney Avenue
New Haven, Connecticut 06520
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Secretary of the Commission
United States Nuclear Regulatory Commission
Washington, D. C. 20555

Attention: Docketing and Service Branch

Gentlemen:

Subject: Federal Register, Volume 45, No. 58
March 20, 1980
Proposed Rules
10 CFR Part 20
Standards for Protection Against Radiation;
Advance Notice of Proposed Rulemaking



As Chairman of the Radiation Protection Committee of the American Association of Physicists in Medicine, I would like to offer the following comments concerning the proposed revision of 10 CFR Part 20, Standards for Protection Against Radiation. Since 10 CFR Part 20 was first written it has been revised numerous times and has grown to be unintelligible and awkward for anyone to use.

No question 10 CFR Part 20 needs a major revision. It needs to be written in plain English, with a clear and logical outline, kept general with minimum of detail, and the standards should be simple while being supplemented with Regulatory Guides. Provision should be made to allow the flexibility of professional judgment in interpreting and applying the provisions of 10 CFR Part 20. The qualified expert on the scene should be given a great deal of latitude in providing a safe working environment. Emphasis must be put on management commitment to the radiation safety program and the expert qualifications of the radiation safety management and personnel. It is important for radiation safety personnel to report to the highest levels of management.

Timing on the Nuclear Regulatory Commission's part may not be the most opportune right now. With talk of major changes within the Nuclear Regulatory Commission, discussion of changing the dose limits, new ICRP guidance, conflicts with Environmental Protection Association, perhaps the revision of 10 CFR Part 20 should be postponed until some of these issues are clarified.

The Radiation Protection Committee of the AAPM at its recent meeting formed a Task Force with Frank Masse, Massachusetts Institute of Technology as Chairman, to work on the revision of 10 CFR Part 20. I would like to suggest that the Task Force become the lead group with the Nuclear Regulatory Commission in

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developing the actual revisions of 10 CFR Part 20. Representatives from other interested organizations could be appointed as members of the Task Force and would serve as a ready pipeline to the Nuclear Regulatory Commission on issues involving the revision.

We hope that the Nuclear Regulatory Commission will accept this offer of assistance from the community actively involved in radiation protection.

Very truly yours,



George R. Holman, Director
Health Physics Division

Chairman
Radiation Protection Committee
American Association of Physicists
in Medicine

GRH:cm

cc: Charles Kelsey, AAPM
Robert Waggener, AAPM
Colin Orton, AAPM
Frank Masse, AAPM
Melvin Carter, HPS
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Henry Ernsthil, SNM