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Reg Guide

29 May 80

Dear Mr. Roecklein,

In response to the draft statement for comment "Instruction Concerning Risk from Occupational Radiation Exposure", I would suggest several changes.

1. On page 7, the next to the last sentence in #6 says "An increased incidence of cancer has not yet been observed at low radiation levels - - -". This is untrue. I refer you to the review by V.E.Archer, "Effects of low-level radiation" in the Jan/Feb 80 issue of Nuclear Safety, where several such studies are mentioned.

2. In this same article, Archer also refers to the BEIR report's estimates of effects of background radiation, saying the calculations appear to have grossly underestimated the role of high LET components. This raises questions in MY mind at least about the validity of that report generally, and your use of it to bolster YOUR conservative estimates of effects of low-level radiation.

3. On page 8, in the second paragraph, I take issue with BOTH the last two sentences. To say that estimates of radiation risks are "at least as reliable as estimates from any other important hazard" is patently false. And to say that the chances being taken are "small and reasonably well understood" is, to say the least, stretching it a bit.

4. It is understandable, considering the purpose of this document, that it would be generally designed to persuade a potential worker that the effects of radiation are minimal. But considering the importance of the issue - we ARE talking about human beings and their health and lives, - I think that they should AT LEAST be made aware of the FACT that there are a number of highly qualified experts in the field who have very different views than those presented in your document. They could be apprised of these views as well, and then encouraged to make up their own minds on the basis of ALL the evidence.

Sincerely,

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Acknowledged by card. 6/9/80. mdv.

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