

OH 900-4



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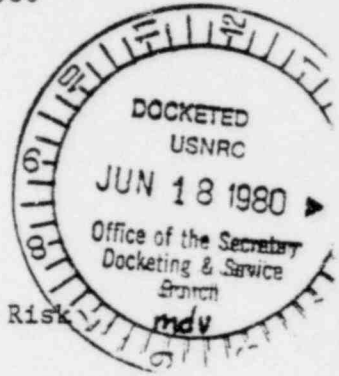
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**PR-Misc Notice**  
**Reg Guide**

June 10, 1980

Radiation Protection Office

A. K. Roecklein  
U. S. Nuclear Regulatory Commission  
Office of Standards Development  
Washington, D.C.



Dear Mr. Roecklein,

I would like comment on Regulatory Guide Instructions Concerning Risk from Occupational Exposure.

1.) It is unclear to me from this guide how you propose to implement if finalized, this guide. Do you plan to have such a document distributed to every new radiation worker to read, or is this a guide for the Radiation Safety Officer in his discussions with radiation workers?

2.) On page eight you state that there are good estimates on the chances of getting cancer from radiation. The word good implies to me that these estimates are accurate and precise. One wonders how good the estimates are based on extrapolation from high dose and high dose rate effects to low dose effects. The committees themselves realise the problems inherent in this. How good these estimates are, i.e. whether they overestimate or perhaps underestimate risk really is unknown. You should delete the word good and state, "... we do have estimates."

3.) The information in this guide you present generally in a somewhat one-sided manner. While you do accurately detail the current accepted position on low level radiation risks, you do not provide information or even references from opposing points of view. By this I mean individuals who feel that these risk estimates are underestimates, not overestimates as proposed by a linear or curvilinear hypotheses. You have an obligation it seems to me to present the controversy on both sides to let each person make up his or her mind on risk estimates even if conventional wisdom does not support a minority view.

4.) If on page 21, the cost of lowering by a factor of 10 the M.P.D. to .5 Rem per year for nuclear power plants may be too high for society, than why did we receive a directive from William J. Dircks of the N.R.C. that medical licences can readily achieve this level ALARA?

In spite of my comments, I think that the guide is a necessary step in the right direction.

Regards,  
*Victor N. Evdokimoff*  
Victor N. Evdokimoff M.S.  
Health Physicist

*Int-11*

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Acknowledged by card. 6/18/80. mdv

June 11, 1980

Mr. A. K. Roeckleir.  
Office of Standards Development  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Dear Mr. Roeckleir:

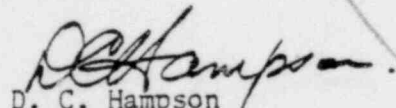
This letter will document previous verbal comments that I gave you relative to the draft regulatory guide on Instructions Concerning Risk from Occupational Exposure (Task OH 902-1, dated May 1980).

This "for comment" draft was reviewed by four individuals and two general comments were common with all of the reviewers: First that this was well done and would be a valuable assist to operating personnel; and secondly it was felt that a minor reorganization would improve its usefulness. This reorganization would involve moving information from tables 5 and 2 into the beginning of the discussion. This would result in introducing the relative risk concept (nuclear worker vs other occupations) early in the discussion. This would tend to allay any preconceived concerns about nuclear operations that a neophyte worker may have. This then could be followed by the remainder of the detailed discussion. We feel that the presentation as currently organized may scare a potential worker off before he understands the situation.

I hope this comment will improve an already good document.

I must state that even though the individuals who made these comments are employed at Oak Ridge National Laboratory, they are personal comments and do not necessarily reflect the position of ORNL.

Sincerely,



D. C. Hampson  
Oak Ridge National Laboratory  
P. O. Box X  
Oak Ridge, TN 37830

DCH/lg