



TEMPLE UNIVERSITY

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RADIATION SAFETY OFFICE

June 11, 1980

FILE NUMBER PR-20 (37) (45 FR 18023)  
UNITED RULE

Secretary of the Commission  
Nuclear Regulatory Commission  
Washington, D.C. 20555

Attention: Docketing and Service Branch

Dear Sir or Madam:



I am writing to comment on and offer suggestions for modifying the advanced notice of proposed rulemaking (FR 45(56): 18023-6 (3/20/80)) concerning major revision of 10 CFR 20, "Standards for Protection Against Radiation."

1. The "Essential Elements of the Radiation Protection Standards" section lists two items that are not covered in the present 10 CFR 20 but are also not apparently included in the "Areas in Part 20 That Need Improvement" section. No explanation for the omission is offered in the text. The items are nos. 6 and 8 under section c, "Standards for Exposures of General Public," and deal with limits of contamination for the release of material for general use and for the disposal of material as non-radioactive waste. In light of present problems, the latter is a particularly important topic and should be addressed in the revision process.
2. I would hope that in writing regulations dealing with instruments (as in section d, "Requirements for a Radiation Protection Program") a cautious approach will be utilized to avoid being so specific that state-of-the art advancements are hindered. Anything beyond performance standards based on the objectives of acquiring information through measurements would, in my opinion, be unduly restrictive.
3. In the "Essential Elements..." section, the need for routine reporting of occupational doses (resulting from internal and external exposure) and of effluents released to the environment is noted. There is, however, no indication of why a change from the present situation (in which data on routine events in our operations are held for review during compliance inspections) is now considered necessary. Interestingly, only the need for routine reporting of internal exposures carried over to the "Areas In Part 20 That Need Improvement" section, but again without indicating the purpose of the reporting or the recipient of the report (NRC? involved individual? other?). Is this intended to expand 10 CFR 20.108 to all licensees and all bioassay results?

L-4-1, Pt. 20

Acknowledged by card. 6/18/80. mdu

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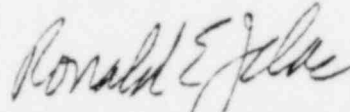
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4. I take issue with the expressed intention (in "Area... That Need Improvement") to present radiation protection principles in Part 20 in terms understandable to laymen. Part 20 is a technical document- it should be written in the terms that are most meaningful to the persons responsible for implementation (i.e., NRC licensees who have, by definition, training, and/or experience in radiation protection related areas). There can be reference to supplementary information, but the regulations themselves should be written in precise terms.
5. The "Areas... That Need Improvement" section indicated that quantitative occupational ALARA guidelines should be established whenever possible for NRC licensed facilities." Would not such quantitative guidelines appearing in regulations effectively be new regulations? Is this not nearly the same as having different regulated exposure limits for different types of installations? Why not just have different exposure limits with a mechanism for requesting exceptions?

Thank you for your consideration of these comments and suggestions.

Very truly yours,



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Director, Radiological Health  
and Biohazards Control

REZ:rm