

OH 902-4

Florida Power Corporation

DOCKET NUMBER: PR-Misc Notice
PROPOSED RULE Reg Guide

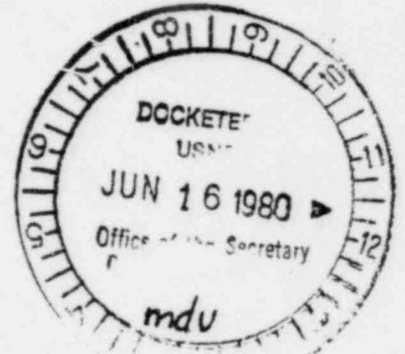
June 11, 1980

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Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Attention: Docketing and Service Branch

Subject: Comment on the Draft Regulatory Guide and Value Impact Statement DH-902-1, Instruction Concerning Risk From Occupational Radiation Exposure



Dear Sir:

My compliments to your organization for producing this type of document which has been needed for quite some time. Many licensees have been providing this type of information to their workers but a formal, uniform requirement can only be beneficial to both the industry and the individual. Please accept my following comments as an effort to help improve awareness and, therefore, reduce unnecessary occupational radiation exposure.

1. This report, though mentioning the fact, does lack sufficient emphasis on the fact that the levels of exposure resulting in detectable effects, are higher, by orders of magnitude, than those doses either allowed by current regulation or those doses actually received by radiation workers.
2. Page six (6), Answer four (4), the term "overexposure" should be described as either exceeding the legal limits or exceeding those doses known to result in detectable effects.
3. Page 21, the term "related to low-level radiation through a linear non threshold extrapolation procedure" will be incomprehensible to the average in-plant worker. Many workers will not ask what that means, and we could avoid their confusion/frustration with the training by explaining that phrase.

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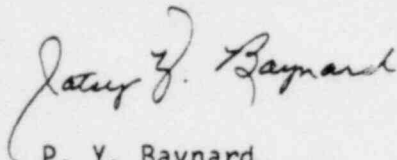
Acknowledged by card. 6/16/80. mdv.

4. A deficiency in this document is the rather passive mentioning of time, distance, and shielding as means of reducing occupational exposure. Further discussion of these factors, plus preparation and practice (dry runs) for maintenance procedures would be extremely beneficial in this training document.

Thank you for the opportunity to review and comment.

Very truly yours,

FLORIDA POWER CORPORATION



P. Y. Baynard
Manager
Nuclear Support Services

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