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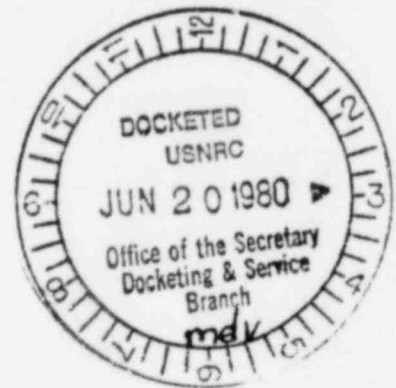
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DOCKET NUMBER **PR-Misc Notice**
PROPOSED RULE **Reg Guide**

June 17, 1980

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

Attention: Docketing and Service Branch



Dear Sir:

I wish to comment on the draft regulatory guide, "Instruction Concerning Risk from Occupational Radiation Exposure," May 1980. The draft guide is well presented, informative, and the question and answer style is appealing.

Emphasis throughout is on cancer (particularly Item 4, Appendix) and the uncertain cause and effect relationship at low exposure levels is often stated, yet it is not until Item 23 is reached that the statement, "The observed effects were related to low-level radiation through a linear, non-threshold, extrapolation procedure." It is upon this concept that all the earlier cited risk estimates have been made. There is no argument about the prudence of the zero threshold concept, but the point could be brought up much earlier with, perhaps, some explanation of the controversy about this assumption.

Item 26 tackles the medical versus occupational exposure dilemma. It is outside the scope of NRC activity to make medical recommendations, but the argument presented is weak. Medical exposures are usually based on the judgment of a single physician without any regulatory provisions and without a corresponding ALARA principle. Medical doses add to the population man-years upon which all cancer risk is estimated.

Very truly yours,

Bernard A. Fries
Bernard A. Fries

BAF:mrf

Acknowledged by card 6/20/80: mdy

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