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PROPOSED RULE PR-Misc. Notice

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

Gentlemen:



RE: INSTRUCTION CONCERNING RISK FROM OCCUPATIONAL RADIATION EXPOSURE, TASK OH 902-1, COMMENT..

Your explanations of the data and comparative risks in the latter part of your publication are excellent. In particular the comparative risks to different occupations and the relation to life expectancy illustrate the low order of danger when the radiation levels are kept small. To the contrary, the questions and their answers are such that one needs to read very carefully and in detail to appreciate that each worker is not going to be creparably damaged. I would strongly recommend the rewording of the questions and answers in a fashion such that the first few sentences places the risks in perspective. As you obviously realize this whole field elicits unreasonable histerical reactions in a good portion of the population. This seems to be particularly true in those who are presumably well educated. In this frame of mind those individuals become totally incapable of reading more than a few sentences or seeing only the word cancer. To help avoid these individuals becoming overly frightened or the news media quoting these few sentences and not the rest, I would like to strongly recommend a reversal of the presentation. This would first of all indicate the essentially unmeasurable risk involved in the average exposure and in the later portion of the report or answers, listing the data from higher levels or risks.

The rationale of indicating the minimal risk involved has solid support. In the first place this is the actual usual exposure. Secondly, the histerical individual frightens not only himself but others, resulting in a mob-like behavior. In addition it is at times to the detriment of the individual not only emotionally but medially. This has become quite common in my practice that individuals are refusing x-ray examinations or wanting only one film when multiple views are required. When asked their reasons they are almost never able to indicate a coherent answer and again and again it is becoming more frequent that they are completely incapable of listening to any logical explanation. My most recent this morning was a refusal of the patient to permit an additional oblique view of the os calcis to evaluate the question of a

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fracture of the anterior portion. The explanation that this was coned down over the tarsal region of the foot with no measurable exposure to the other portions of the body had no meaning to the patient. Incidentally the measurement of the total body exposure from medical x-rays as listed in the various papers and dated collections in their final analysis never point out that the exposure frequently is confined to a portion of the body on g and may be only to a few cubic cm.. Total body radiation never occurs or at least should never occur other than for that done by the chiropractors, etc.

Over my thirty years experience as a Radiologist, I have been one of the strongest advocates to reduce the amount of x-rav exposure. Recently I have been obligated to argue on the other side of the fence to counteract the histerical extreme of public comments. It is for these reasons in particular that I would strongly encourage the rewording of your questions and answers in this publication, otherwise I am delighted and you are to be commended.

Sincerely yours,

George W. Henry, M.D

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