

UTILITY WORKERS UNION OF AMERICA

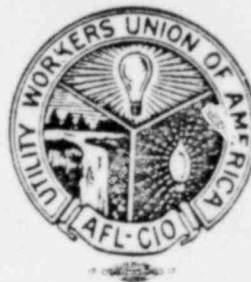
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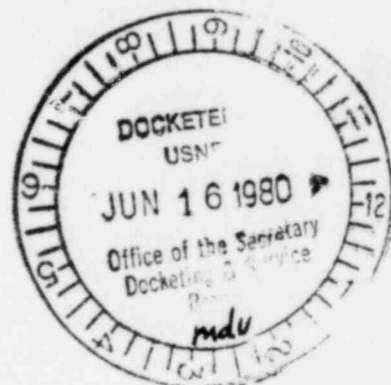
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DOCKET NUMBER

PROPOSED RULE

PR-20 (26)
(45 FR 18023)

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



ATTENTION: Docketing and Service Branch

RE: Public Comments - 10 CFR Part 20
Standards for Protection Against
Radiation; Advance Notice of
Proposed Rulemaking

Dear Sirs:

The Utility Workers Union of America, AFL-CIO, generally supports the efforts of the Nuclear Regulatory Commission in its efforts to update, improve and clarify the "Standards for Protection Against Radiation".

However, even in view of the difficulty in making specific comments at this stage in the development of the standards, we do wish to suggest some additional considerations and possible changes in the announced direction of some of the proposed standards.

ESSENTIAL ELEMENTS OF THE RADIATION PROTECTION STANDARDS

a. RADIOLOGICAL PROTECTION PRINCIPLES

- (2) All Exposures shall be kept as low as reasonable achievable, economic and social factors being taken into account.

The Utility Workers Union of America suggests that the above stated principle be reconsidered and some other way be found to protect the interest of the licensee than that of establishing a dollar figure on the reduction of radiation exposures to workers; while it is clearly understood that there may well be a point where the increasing cost of reducing the amount of radiation exposure far exceeds the benefits of the reduced levels of radiation.

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However, a standard that would leave the judgement of when that situation arises where the reduction of radiation levels is no longer cost effective to the management or supervision of the licensee or to an arbitrary figure set by a regulation leaves out the most important consideration - the "health effects" to the worker - we would suggest that such a standard not only take into consideration the concerns of the licensee and his costs but would also give the workers an opportunity to have some say in whether or not he wishes to perform the work when the economic factor is used to determine that further reductions in exposure levels will not be pursued.

b. STANDARDS FOR INDIVIDUAL OCCUPATIONAL EXPOSURE

- (5) Provisions for planned special exposures and overexposures.

The Utility Workers Union of America does not agree that there should be any need for "planned over-exposures" and provisions for such should not be included in the standards.

While we have generally accepted the fact there is considerable margin for error in the establishment of the standard for exposure to radiation and that there is no immediate danger of death, injury or non-stochastic effects from exposures of some limited degree above the standards set by the NRC and other organizations concerned with radiation exposures, we do not believe once those margins for error are established there should be any planned or a need for planned bypassing of the standards.

We have assumed that the NRC is thinking of following the recommendations of the ICRP in this matter and would use only volunteers for such overexposures and that the number of times and the spacing between such overexposures would be very limited. Even with those limitations we would be opposed to any "planned overexposures" which we have assumed are other than "emergency overexposures" where it might be necessary to take action that would prevent a serious accident and additional exposures to other workers or the public. We sincerely believe that if there is sufficient time to plan for the "overexposures" there is sufficient time to make the necessary reduction in the radiation levels.

d. REQUIREMENTS FOR A RADIATION
PROTECTION PROGRAM

Under this section we would propose that item (12) be re-worded to provide that the Requirements for a Radiation Protection Program include "Procedures for eliminating overexposures" rather than procedures for merely "managing" such overexposures.

We would also propose that additional items be added to provide for the involvement of the workers and workers' representatives in auditing and controlling the exposures and also to provide for worker access to this medical and exposure records and to further provide for periodic full body counts and full body counts following all exposures to internal contamination and a full report of findings made available to the worker involved.

AREAS IN PART 20 THAT NEED IMPROVEMENT:

b. STANDARDS FOR INDIVIDUAL OCCUPATIONAL EXPOSURE

While the UWUA supports generally the adoption of the ICRP concept and recommendations on the use of "Effective dose equivalents" and the dose limitations for combined internal and external exposures, there are some aspects of the ICRP recommendations that are not acceptable.

Under these recommendations there are some instances where the annual limits of intake for a number of radionuclides would be greater than is presently permitted under 10 CFR Part 20. We believe that where the ICRP recommendations impose more stringent restrictions or limitations on exposure levels they should be followed and in those instances where the current provisions of 10 CFR Part 20 impose more stringent limitations 10 CFR Part 20 should be maintained.

Our comments made previously with regard to "planned overexposures" and "special exposures" should be applied to the consideration of item (3) under this section as well.

f. MISCELLANEOUS

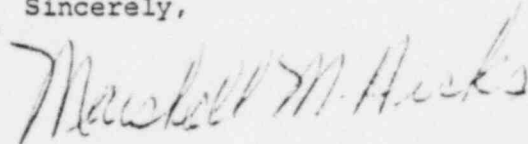
The Utility Workers Union of America does not feel that the adoption of the SI (System Internationale) units with related conversion formulas should be considered. One of the greatest obstacles for the nuclear industry

to overcome is the "mystery" or misunderstanding of many of the phrases and nomenclature used currently. It has taken years and a significant educational effort to familiarize the workers and the public with "Curies", "Rads", "Rems" and other such designations for radiation and radiation effects. A change at this time to terms not previously used that would have to be accompanied with "conversion formulas" or conversion tables would merely add even greater confusion and a feeling that someone was trying to move away from an understandable limitation on radiation exposures.

If there is no compelling technical or scientific reason for adopting the SI units of "grays", "sieverts" and "becquerels", and apparently there is no such compelling reason as none was stated by the Staff in its proposals, we would strongly oppose such a consideration.

If there is a desire to include conversion formulas or conversion tables for those who wish to have them available in a case where it became necessary to compare some information with an international publication of information containing such designations we would have no objection, as long as the designations we have come to understand and use effectively are continued.

Sincerely,



Marshall M. Hicks
National Secretary-Treasurer

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