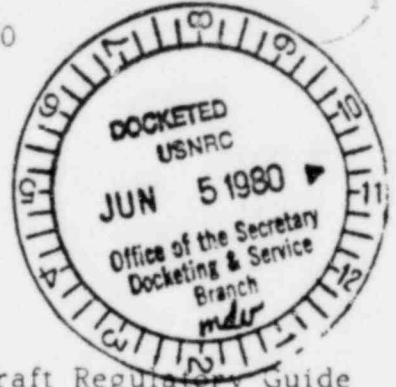


OH 902-4

PROMULGATED RULE PR-Misc. Notice
Reg Guide

May 27, 1980



Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington D.C. 20555
Attention: Docketing and Service Branch

RE: Comments on the May 1980 Division 8 Task OH902-1 Draft Regulatory Guide and Value Impact Statement "Instruction Concerning Risk from Occupational Radiation Exposure".

To Whom It May Concern:

I have reviewed the "Instruction Concerning Risk from Occupational Radiation Exposure" prepared by the U.S. Nuclear Regulatory Commission, Office of Standards Development. While I consider the draft a good attempt to instruct occupational radiation workers; I feel that the entire field of medical occupational radiation exposure has not been addressed properly. The document apparently has been written for occupational workers whose primary employment is at a nuclear power plant. Occupational radiation exposure is not unique to the nuclear power industry. Some mention of the other industries which employ radiation workers should be made. For example we at St. Elizabeth Hospital have a teletherapy license and have trained radiation therapy technologists, physicians, and a medical physicist all considered radiation workers. Each individual is monitored as per the NRC requirements. Additionally, the field of nuclear medicine employs several radiation workers including radiopharmacists, nuclear medicine technologists, and nuclear physicians.

Since the Nuclear Regulatory Commission has jurisdiction over medical licenses for teletherapy units and radionuclides; I feel that the present draft should be revised to include this second perspective.

Sincerely yours,
Mitchell G. Randall
Mitchell G. Randall, M.S.
Medical Physicist
TRP-11

MGRmmim

Acknowledged by card. 6/5/80. mdy.

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