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## NORTHWESTERN UNIVERSITY

EVANSTON, ILLINOIS 60201

THE TECHNOLOGICAL INSTITUTE DEPARTMENT OF CIVIL ENGINEERING

J"ne 26, 1980

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

Dear Sir:

This is a comment on "Instruction Concerning Risk from Occupational Radiation Exposure," Division 8, Task OH 902-1.

My comment deals with Table 2, page 13, and Table 3, Page 14. The population base on which the numbers in the column that lists the estimated number of days of lost life expectancy is not given. For example, is the number of lost days of life for alcohol consumption, 130 days, the average for the entire population, for drinkers only, per 100,000 population, or per what? As they are now presented, the numbers don't mean very much to me. The same comments apply to Table 3. Table 4, however, is meaningful, since it gives the number of accidental deaths per 10,000 workers per 40 years.

Very truly yours,

Herman Cember Professor Environmental Health Engineering

HC/ms

Acknowledged by card. L.O'L Z/1/m

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