

HAROLD O. WYCKOFF

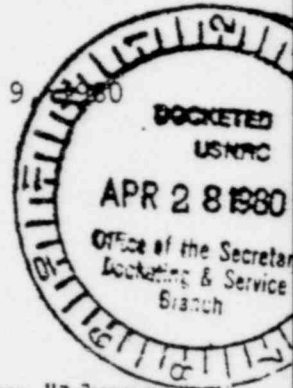
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The Secretary of the Commission  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

April 9, 1980

DOCKET NUMBER PR-20 (6)  
PROPOSED RULE (45 FR 20493)



Attn: Docketing and Service Branch

Dear Sir:

In the Federal Register for March 29, 1980, the NRC published an "Advance Notice of Proposed Rulemaking" for protection against radiation. This letter comments on that publication.

It seems to me that this publication may be out of line with Federal policy because it makes no mention of this action having been approved by the Radiation Policy Council. Furthermore, it follows a similar request for public comment by the Environmental Protection Agency. It appears that these two Federal Agencies either (a) don't keep each other informed or (b) are trying to stake out a claim to as much turf as possible before the Radiation Policy Council has an opportunity to act. Which is it?

On page 18024, column 1, it is said that previous revisions have been made "but none of them affecting the basic structure or fundamental approach to radiation protection embodied in the original publication." I don't understand what is meant by this. Does this mean that the NRC is condoning the lack of clarity in the revisions? The current standards for example, 5 rems in the year for "whole body" may be misleading. I suspect that they were meant to include the assumption that the whole body was uniformly irradiated. Some persons reading this limitation also assume that the reading of the personal badge should not receive this value. This sloppy approach to radiation protection standards presumably will not be favored in the revised standards.

Page 18024, column 3 -- Under assumptions 1 and 2, the words "stochastic effect" are used. First of all, will the reader understand what is meant by these words and second, is it proposed that there will be a limitation for non-stochastic effects?

On page 18025, section c (1) it is indicated that there should be numerical dose limits for internal, external and combination of exposures. How should one interpret these words? Is there reason to think that the biological effect will be different depending upon whether the source is internal, external or a combination?

On page 18025, column 2, paragraph a (2), it is said that "the ALARA principle and requirements for both effluents and occupational exposures should be strengthened". The first part of the sentence has to do with the principles for which there can be no hard and fast dose limits. (I am using the interpretation now used by the people who generated the principle and not that used by regulators who don't appear to understand the principle.) The second part

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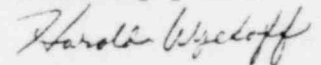
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apparently deals with dose limits. How are these thoughts connected?

On page 18025, near the end of column 2, mention is made again, of "whole body" exposure from an external source as if it were truly a uniform exposure. It also speaks of a "whole body" exposure from an internal source as if it were also uniform. Actually, there are very few radionuclides that provide uniform whole body exposure even when they are taken into the body. From the way in which this statement is made it is not clear whether the authors understand the situation or are merely trying to make a major point from a situation that rarely occurs. Some would use such statements as an indication that the bureaucracy's understanding cannot be trusted.

It may be noted that no suggestions are made regarding the material to be included in the new standard. How can comments be made until the arguments are set down and the limits logically developed from the available information? Some might consider the current call for comments as a delaying tactic.

Sincerely yours,



Harold O. Wyckoff

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