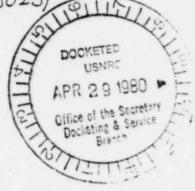


PROPOSED RULE PR

April 25, 1980

United States Nuclear Regulatory Commission Washington, D.C. 20555





Dear Sir or Madam:

In reply to your request for comments on Federal Register Volume 45 No.56, Proposed Rules, Nuclear Regulatory Commission, 10CFR Part 20, Thursday March 20, 1980 please note the following:

Section I - Paragraph A

The assumption of a linear relationship is unproved or that the severity of the effect is independent of dose. Strong evidence for the truth of this statement should be made a part of the regulations.

Paragraph I

No practice should be adopted unless it produces net benefit in a costbenefit statement. It is difficult to foresee either the cost or the benefits at this time.

Paragraph IV

Will the regulations specify the potential risk of exposure? Will the regulations contain documentation of the probable truth of their statement of risk?

In order fo the to comment effectively on these Radiological Protection Principles considerable research material will be required. Specifically the material upon which the NRC committee is basing its proposed changes. Do you have copies of the material available?

Sincerely,

ROBERT D. MC AFEE. PH.D. Radiation Safety Officer VA Medical Center New Orleans, LA 70146 Senior Scientist Research Service VA Medical Center (Field of Research Microwave Radiation Effects on Rhesus Monkeys)

4cknowledged by card. 5/9/90 andu.

RDM/mwf