



Texas Tech University

BOX 4369 / LUBBOCK, TEXAS 79409 / (806) 742-3876

ENVIRONMENTAL HEALTH AND SAFETY



May 5, 1980

JACKET NUMBER PR-20 (13)
PROPOSED RULE
(45 FR 18023)

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

Re: 10 CFR Part 20
Advance Notice of Proposed Rulemaking

Gentlemen:

Here are my comments:

Under (a) Radiological Protection Principles [2]

What do social factors have to do with radiological protection principles? Does this mean that radiological protection will vary from city to city just as censorship laws do? I believe that the words "social factors" should be stricken from this paragraph since it really doesn't apply to a scientific field such as radiological protection.

Under (a) Radiological Protection Principles [4]

I do not favor informing individuals of their risk from radiation sources since the linear model without threshold could easily over-estimate risk by a factor of ten over other models. Does the Denver-Chamber of Commerce inform their citizens of the radiological risk of living there rather than in New York?

Under (a) Standards for Individual Occupational Exposures

I do not favor consideration of special provisions for limiting exposures of susceptible groups as I believe the standards are low enough so that additional exposure presents little additional risk.

Acknowledged by card. 5/9/80 mdy

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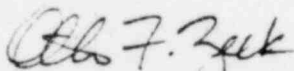
Under (c) Standards for Exposures of the General Public

I do not favor consideration of special population groups in siting considerations as I do not feel this factor significantly affects these matters, especially in as loose a definition as it is here.

Under (a) Radiological Protection Principles

I feel that the ALARA Concept is being implemented satisfactorily now and does not need to be further strengthened.

Sincerely,



Otto F. Zeck, Ph.D.
Radiation Safety Officer

80/RU/340