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May 15, 1980

PROPOSED RULE PR-20 (17)
(45 FR 18023)

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

Attention: Docketing and Service Branch

Re: Federal Register 45:18023-18026 MAR.20,-80.

Dear Mr. Secretary:



On review of the notice by the Nuclear Regulatory Commission published in the Federal Register, several facts come to mind which should be included for completeness.

First: As the notice points out the present standards seem to be outdated. Therefore, it will be important to include in new regulations some techniques for introducing rational changes. In order to make those rational changes some periodic assessment of the state of knowledge of radiation exposure risk must be included. There are now serious deficiencies in the knowledge of risk of low level radiation exposure. Few facts have been collected. Some work is being done now. It is the duty of any regulatory body to maintain a continuous observation of its field of authority in order to collect the duly elicited facts and incorporate them into the rational review of their regulations. This responsibility cannot be discharged by merely sitting in judgement over an adversary proceeding between the staff of the body and representatives of those who are regulated.

Second: As in any discipline with pretension to scientific/technical application of a set of physical phenomena new techniques for using ionizing radiation and handling its sources will appear. It must be the duty of the Nuclear Regulatory Commission to follow these developments with purpose of encouraging those methods which reduce the dose to the population and discouraging those which increase the dose. (All the time balancing risk against benefit.)

Acknowledged by card. 5/20/80 mdw

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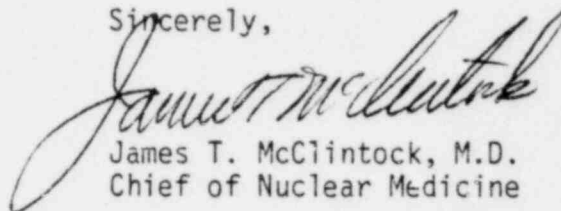
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Up to now the Nuclear Regulatory Commission and its predecessors do not seem to have included these procedures in their formal activities. Any body charged with the regulation of an activity with such important and long-term effects must deal with the matter in a rational, knowledgeable and current fashion.

Thank you very much for your kind attention.

Sincerely,



James T. McClintock, M.D.
Chief of Nuclear Medicine

JTM:pjt

cc: Paul A. Riemenschneider, M.D.
Mr. O.W. Linton (American College of Radiology)
Robert D. Mosely, M.D. (Department of Radiology,
University of New Mexico)