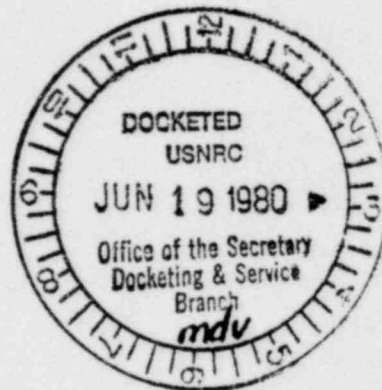




Department of Energy  
Climax River Breeder Reactor  
Plant Project Office  
P.O. Box U  
Oak Ridge, Tennessee 37839

DOCKET NUMBER **PR-20** **(46)**  
PROPOSED RULE  
**(45 FR 18023)**

June 17, 1980



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

ATTN: Docketing and Service Branch

Dear Sir:

COMMENTS ON PROPOSED REGULATION CHANGES 10CFR20

We have reviewed the proposed regulation changes to 10CFR20 provided in the Federal Register notice of March 20, 1980. Our comments, which are enclosed, specify considerations we believe are important in implementing the proposed changes to the 10CFR20 regulations.

Sincerely,

*Raymond L. Copeland*  
Raymond L. Copeland  
Acting Assistant Director  
for Public Safety

PS:80:180

Enclosure

Acknowledged by card. *6/19/80. mdv.*

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## COMMENTS ON PROPOSED RULEMAKING TO 10CFR20

Essential Elements of the Radiation Protection Standards

1. The NRC position that "the standards should be structured in a manner that is easily understood and can be readily revised to accommodate legislative and technical changes as necessary" is a commendable goal. However, care should be exercised to avoid reducing the operational and design flexibility in the current regulations and guidelines.
2. Since there is a controversial technical basis for stating, "there is within the range of exposure conditions usually encountered in radiation work, a linear relationship without threshold between dose and probability of stochastic effect," the value/impact statement associated with the regulation changes should clearly state that this is a conservative assumption.
3. In item (a)(1), the objective that "no practice. . . a positive net benefit" is reasonable; however, the quantification of the "positive net benefit" is highly subjective and depends on the parameters used to calculate the costs and benefits. Since utilities must meet 10CFR20 exposures and the ALARA guidelines, the utilities, as a practical matter, control personnel exposures to minimize costs and insure each man-rem is spent on a needed activity. The current ALARA guidelines allow the utility the flexibility to control personnel exposures within 10CFR20 and minimize costs.
4. Item (a)(3), "The dose equivalent to individuals shall not exceed the limits selected for the appropriate circumstances," is too vague. The limits and circumstances need to be specified.
5. The exposure of "special groups" should be considered; however, the notice did not indicate how this consideration would be implemented. The implementation of this approach should recognize both the groups and the socio-economic needs.
6. Item (b)(2), the special provisions of this regulation should be guided by the "Interpretive Guidelines on Employment Discrimination and Reproductive Hazard," Federal Register, Friday, February 1, 1980, Part VI, Equal Employment Opportunity Commission, Department of Labor, Vol. 45, No. 23, Proposed Rules, pg. 7514-7517.
7. Item (d)(4), if this item is proposing to quantify specific ALARA limits, then the intent of ALARA will be compromised. An objective of "ALARA" is to permit the utilities the flexibility to reduce doses below the regulations recognizing economics and social factors.
8. Items (3), (9), and (13), the procedures should permit the utility the flexibility to choose between available options.

Areas in Part 20 That Need Improvement

1. The quantitative occupational ALARA guidelines should not be interpreted as meaning numerical occupational ALARA limits. To quantify ALARA guidelines would compromise the intent of ALARA because the approach could not completely address the individual plant characteristics or allow the current flexibility.
2. The derived limits for concentration in air and water should be retained and updated to reflect the most current technical data. The use of limits for intakes would provide an additional perspective and flexibility of resolving similar problems. An acceptable approach to this issue would be to have both derived limits for concentrations and intakes together, so that it is the responsibility of the facility to determine how and what procedural or policy guidelines to follow. This approach would provide supplemental information that would facilitate complementary resolutions.
3. Item (c)(1), current analyses of air and water pathways assume very conservative assumptions. The types of additional pathways being considered is not clear. The additional pathways should be defined before meaningful comments can be provided.
4. Item (f)(1), it is recommended that the systems' international units should not be adopted since it will introduce additional confusion in an already sensitive and esoteric subject and is not consistent with the goal of (a)(1).