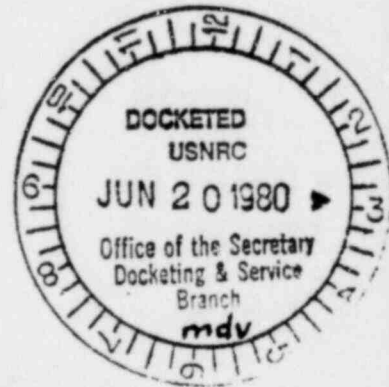


MOTOR VEHICLE MANUFACTURERS ASSOCIATION  
of the United States, Inc.  
300 NEW CENTER BUILDING • DETROIT, MICHIGAN 48202 • AREA 313-872-4311

BROOKS McCORMICK, Chairman  
V. J. ADDUCI, President and Chief Executive Officer  
THOMAS H. HANNA, Senior Vice President

DOCKET NUMBER PR-20 (55)  
PROPOSED RULE (45 FR 18023)

June 18, 1980



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

Subject: Advance Notice of Proposed Rulemaking on  
Standards for Protection Against Radiation

Dear Secretary:

The Motor Vehicle Manufacturers Association of the United States, Inc. (MVMA)\* welcomes the opportunity to comment on the Nuclear Regulatory Commission's (NRC) Advance Notice of Proposed Rulemaking on Standards for Protection Against Radiation. The notice appeared in the Federal Register on March 20, 1980, (45 FR 18023).

MVMA is a non-profit trade association whose member companies produce more than 99 percent of the domestic motor vehicles and employ more than 900,000 workers in the United States.

The radiation protection standards are long existing regulations in the field of personnel protection from hazardous agents. By comparison to other health regulations, the radiation protection standards are based on precise and definitive scientific information. They have provided effective protection for persons who work with sources of radiation.

\*MVMA members are: American Motors Corporation, Checker Motors Corporation, Chrysler Corporation, Ford Motor Company, Freightliner Corporation, General Motors Corporation, International Harvester Company, PACCAR Inc, The Nolan Company, Volkswagen of America, Inc., Walter Motor Truck Company and White Motor Corporation.

Acknowledged by cert. 6/20/80 mdv

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The Federal Register announcement contains an explanation of the need for a review of the radiation protection standards. Excerpts of the text follow:

"For these reasons, the NRC is initiating a rulemaking proceeding for the purpose of modernizing its radiation protection standards." (emphasis added)

"In addition, there has been a growing public interest in and concern about the potential health effects of low-level ionizing radiation." (emphasis added)

MVMA questions why the standards should be "modernized". They have provided effective protection and their underlying toxicological foundation is precise when compared to other health regulations. Likewise, "growing public interest" and "concern" standing alone does not warrant a change in the standards.

In developing your proposed rule we recommend that changes should be based on sound, scientific evidence. Also, social and economic factors must be taken into account. A balance must be maintained between the social benefits derived from the use of radiation and the associated risks.

Secondly, MVMA is concerned about the use of the phrase "as low as reasonably achievable" (ALARA) in conjunction with "numerical guides" and "program requirements" (this appears on page 18024, column 2.) As used by the NRC in the past the term, ALARA, embodies the principle that a discreet reduction in radiation exposure can be reasonably achieved under circumstances of a specific use. It also means that under a different set of circumstances the same reduction may not be reasonably achievable.

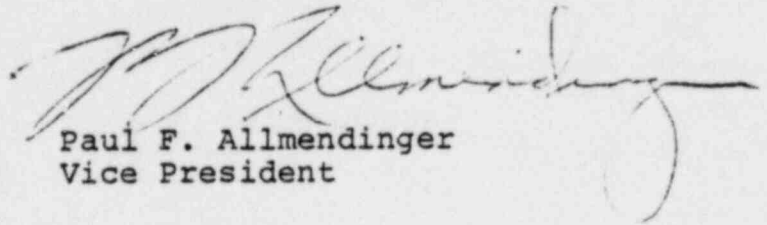
By attaching a number to the term, ALARA, this meaning can no longer apply. If ALARA includes the concept of a numerical guide, then in essence the judgment involved in determining what is reasonably achievable has been removed. Thus, the circumstance surrounding the use of a radiation source would no longer have a bearing upon what exposure is reasonably achievable.

Accordingly, MVMA recommends that ALARA not be used in this way. Numerical guides and program directives could stand alone since their meaning is clear from use. Alternatively, should it

be justified to modify them, a term or phrase should be used which has not acquired a specific meaning through usage as in the case of ALARA.

Your careful consideration of these views and recommendations would be appreciated.

Yours very truly,

A handwritten signature in cursive script, appearing to read "P. F. Allmendinger". The signature is written in dark ink and is positioned above the typed name and title.

Paul F. Allmendinger  
Vice President