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LEO D. CARNSER, ADMINISTRATOR

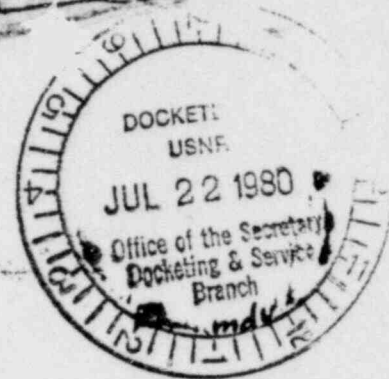
July 17, 1980

DOCKET NUMBER
PROPOSED RULE

PR-Misc Notice
Reg Guide

U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

ATT: Docketing and Service Branch



Dear Sir:

This letter is in regards to your Draft Regulatory Guide and Value/Impacts Statement Task OH 902-1 which is titled "Instruction Concerning Risks from Occupational Radiation Exposure". I am of the opinion that this regulatory draft guide adequately covers the information of occupational radiation exposure, however, in order to add to the completeness of this document I would also suggest adding a section which deals with prenatal radiation exposure. Although Nuclear Regulatory Guide 8.13 which deals with prenatal radiation exposure is already in effect, I feel that some type of numerical risk analysis should be given to prenatal radiation exposure.

I hope this comment may help in preparing your final draft.

Sincerely yours,

Daniel A. Berkley

Daniel A. Berkley
Radiation Safety Officer

DAB/gs
cc

Acknowledged by card. 7/22/80..mdv.

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TAP 11