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National Bureau of Standards
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PR-Misc Notice
Reg Guide

July 15, 1980



Secretary of the Commission
Attn: Docketing and Service Branch
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Dear Sir:

In response to your request for comments on the Draft Regulatory Guide titled "Instruction Concerning Risk from Occupational Radiation Exposure", please consider the following, representing my personal opinions and not necessarily those of the National Bureau of Standards.

First, let me commend you on a remarkable job of compiling information. The material should prove helpful in responding to questions and comments that are frequently encountered in radiation safety work. I particularly appreciate your use of certain analogies, e.g., automobile travel and cigarette smoking, in establishing the relativity of the risks discussed.

Secondly, I certainly appreciate the position of the Commission and empathize with the feeling that occupational radiation exposure risks must be viewed from an overall occupational risk viewpoint. Many of the people I interact with, even technically well-trained persons, seem to have an exaggerated perspective of the risks of radiation exposures.

However, I believe the draft version has major deficiencies. I see a trend in regulatory activities that leaves little or nothing to the discretion of the licensee; the draft would, in effect, force a licensee to educate the entire work population to the entire information packet. There would be no allowance for judicious licensee action; for example, the work force is composed of a broad spectrum of components: interest level, academic background, and occupational environment such as custodial force/bench scientist, and the educational program should be tailored to fit these needs. I also feel that the topic, as presented in the title, does not need to include such areas as political or socioeconomic decision-making. These areas include the role of the Commission, the numerical limits that are of regulatory origin, or perhaps even ALARA or collective dose. As presented, the information in the appendix is dissertative, footnoted, and bibliographed, almost to exhaustion. In my experience, there is no audience that could be "educated" to this extreme without an unduly intensive and/or lengthy training process.

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COMMENTS

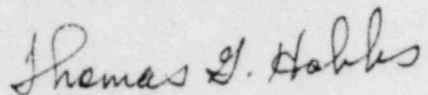
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I would strongly suggest that, rather than an appendix to a Regulatory Guide, information be presented as typical of that required, perhaps in NUREG format, to assist licensees in adequately preparing the worker to choose intelligently from available alternatives. Ideally, information could be made available in colorful, pictorially attractive, much abbreviated format, such as "Radiation-- A Fact of Life" from IAEA, or "Radiation Risks for Nuclear Workers" from AIF. The impact on a needed education program could be much enhanced if training aids such as these were available, with the necessary risk information.

Thank you for your attention to this matter.

Sincerely,



Thomas G. Hobbs
Chief, Health Physics

cc:
Document Management Branch. NRC