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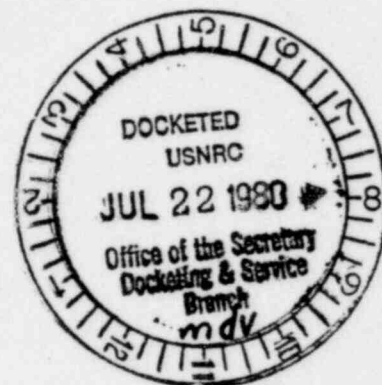
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THE TECHNOLOGICAL INSTITUTE
DEPARTMENT OF CIVIL ENGINEERING

DOCKET NUMBER
PROPOSED RULE PR-Misc Notice
Reg Guide

July 14, 1980



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

Dear Sir:

This is a comment on the Draft Regulatory Guide "Radiation Protection Training for Light Water Cooled Nuclear Power Plant Personnel", Div. 8, Task OH 717-4

Under paragraph 3. Objectives, objective "a" deals with informing the trainee about the biological effects of radiation. This is necessary and useful. However, I believe that one of the objectives, and perhaps part of objective "a", should be to inform the trainee of the biological basis for radiation protection standards rather than merely informing him of the biological effects of radiation. These two are not the same. The biological basis is a philosophical concept that deals with the extrapolation from observed effects to a region where we really do not expect to find effects.

I believe this distinction to be important because I find that most people, including some radiation protection personnel, don't really understand that many of the effects on which radiation protection standards are based are postulated for the purpose of setting standards at levels such that we really do not expect to observe those effects. It is important, I believe, to include in the training, the fact that we have never observed the postulated effects among workers whose radiation doses were within the guidelines.

Very truly yours,

Herman Cember, Ph.D.
Professor, Environmental Health

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Acknowledged by card. 7/23/80 mdv
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