

Methodist Hospital 2500 EXCELSIOR BOULEVARD • ST. LOUIS PARK, MINN. 55428 • TELE. 932-5000

July 2, 1980

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



Sir:

I would like to comment on proposed regulatory guide OH902-1 "Instruction Concerning Risk from Occupational Radiation Exposure".

I get the impression from remarks in part D. Implementation of the introduction that unless a licensee explains to the NRC his instructions to workers regarding these matters in the same detail as this guide is written he will be expected to instruct them by virtually reading the guides to them. I do not think this is your intention and certainly hope it is not.

The guide is nicely written and provides a good basis for preparing a lecture on the subject. As one who gives many such talks to radiation workers in the medical field, I will be glad to have statistics that the NRC considers acceptable to quote. But, please, don't make your regulations so precise that I have to read a lengthy document aloud to employees or make them read it or listen to a recording of it. I would think the use of an outline of important topics to be covered in a satisfactory education program would be enough regulation, with a reference to your guide as a useful tool in preparing the information to be dispensed. Please leave some leeway for educators to use their ingenuity in making this material interesting. If all of my employees are asleep while I read the law, I may meet the legal requirements but you will have failed to educate them.

Sincerely,

Richard Geise, MS
Medical Physicist

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Revised by card 7-9-80

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