

OH902-4

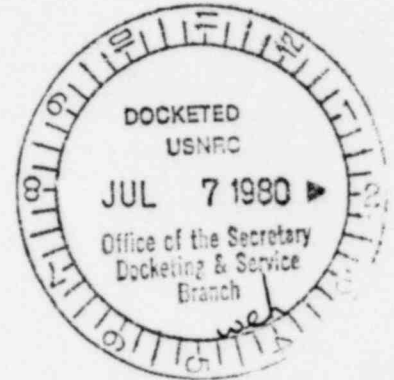
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DOCKET NUMBER
PROPOSED RULE PR *Misc Notices*
Reg Guide

Secretary of the Commission
Docketing & Service Section
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555



Dear Sir:

Enclosed are our comments on the proposed draft regulatory guide and value/impact statement "Instruction Concerning Risk From Occupational Radiation Exposure" Task OH 902-1, May 1980.

We appreciate having been given the opportunity to comment.

Yours very truly,

J. S. Loomis / D. W. Kane

J. S. Loomis, Head
Nuclear Safeguards &
Licensing Division

JSL:LAL:cjr
Enclosure
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Acknowledged by card 7-7-80

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Sargent & Lundy Comments on Draft
Regulatory Guide and Value/Impact
Statement, "Instruction Concerning
Risk From Occupational Radiation
Exposure" May 1980, Division 8,
Task OH 902-1

General

1. The draft guide in Appendix A is very complete and could be provided to those radiation workers who ask, "What are the risks associated with occupational radiation exposure?" and wish to study the problem in more detail. But the draft misses, almost completely, the intent of Section 19.12 of 10CFR19, namely instruction in radiation protection procedures. The practical training in radiation protection is buried in the response to question 31, option 3. This is the only place in the draft where practical radiation protection training is addressed.

The present draft offer postulates (e.g., linear versus threshold theory) upon which many investigators in the field cannot agree. We find it hard to expect the average radiation worker to evaluate this issue when "experts" are unable to reach a definitive conclusion.

Specific

The Appendix to this draft should be divided into two parts.

1. The first part should emphasize a basic education into the means of providing radiation protection and demonstrate practically how radiation exposure can be minimized.

Utilities often provide their employees with radiation protection guides in booklet form. These guides are used, after classroom instruction, to keep the worker current on radiation protection procedures guidance for who to contact for further information.

Information such as this should suffice for meeting 10CFR19.12 requirements and would be available from the utilities.

2. The second part should provide a discussion of the associated risks with occupational radiation exposure as outlined in Appendix A of the present draft.