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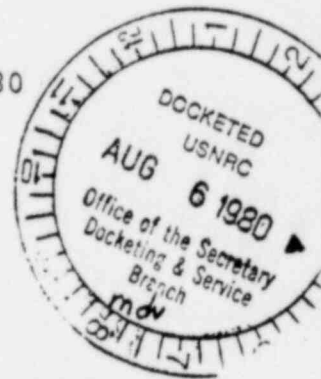
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PR-Misc Notice
Reg Guide

August 5, 1980



Secretary of the Commission
United States Nuclear Regulatory
Commission
Washington, D.C. 20555

Attention: Docketing and Service Branch

Dear Sir:

RE: Task No. OH 902~~6~~-4, Draft Regulatory
Guide, "Instruction Concerning Risk
from Occupational Radiation Exposure"

On May 29, 1980, notice of availability of a draft regulatory guide entitled "Instruction Concerning Risk from Occupational Radiation Exposure" was published in the Federal Register (45 Fed. Reg. 36240). The American Mining Congress (AMC), through its Uranium Environmental Subcommittee, offers the following comments on this draft regulatory guide.

AMC is a trade association composed of over 500 companies that produce most of the nation's metals, coal, and industrial and agricultural minerals; companies that manufacture mining and minerals processing machinery, equipment, and supplies; engineering and contracting companies and banks that serve the mining industry. AMC's membership includes companies that mine and mill substantially all of the uranium produced in this country and, therefore, this draft guide is of paramount importance to AMC.

The draft regulatory guide represents a reasoned effort to convey to a mill worker the risk of occupational exposure to radiation. The staff of the Division of Siting, Health and Safeguard Standards, Office of Standards Development should be proud of the thoughtful and careful way in which this document was prepared.

AMC suggests only two improvements. First, the entire document should be reviewed to assure that it is written in a manner that any worker can understand. Second, the draft regulatory guide should include a provision explaining that every worker has an affirmative obligation to protect himself from unnecessary exposures.

Continued...

*J+P-11
Guide*

Acknowledged by card. 8/6/80. mdv...

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The recognition of personal responsibility by individual workers is an integral part of any successful health and safety program. With these improvements, the regulatory guide will be valuable to both employers and employees.

Again, we thank you for this opportunity to comment on this matter.

Sincerely,

Larry A. Boggs

Larry A. Boggs
Counsel