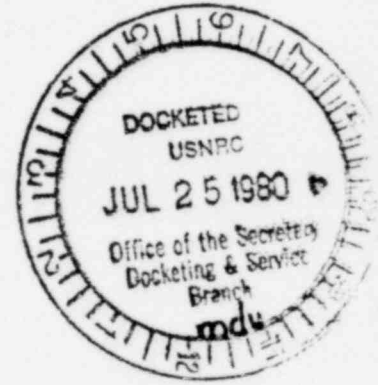


Pan American World Airways, Inc.  
Eastern Test Range Project  
Patrick Air Force Base, Florida 32925

OH 902-4

14 July 1980      DOCKET NUMBER  
                    PROPOSED RULE      PR-Misc Notice  
  Reg Guide

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



ATTN:              Docketing and Service Branch  
  
SUBJECT:          DRAFT REGULATORY GUIDE OH 902-1  
  
REFERENCE:      Draft Regulatory Guide and Value/Impact Statement  
                    OH 902-1, May 1980, Division 8

Dear Sir:

In response to your request for comments on the reference guide, the following is submitted:

The instructional approach taken in Draft Regulatory Guide OH 902-1 of Questions and Answers is commendable. However, there are items which should be included to help provide a better understanding of the subject. The terms "Rem" and "TLD" should be defined. Much of the absorbed dose to the general public in their daily contact with radioactivity can be measured in millirems. Even with radiation workers, the application of the "Time, Distance and Shielding" policy advocated in all training programs can reduce their exposures (except in rare instances) to millirems. Dosimetry is regularly reported in millirem, yet, generally throughout the instruction, the term "Rem" is used. This might lead one to believe that high doses of radiation in industry are normal. Also, the different types of radioactivity should be discussed; the difference between particle contamination and penetrating radiation should be explained.

Further emphasis should be placed on the safety aspects of the radiation business which could lead to reduced exposures and fewer potential biological problems. Reiterating the health risks without pointing out what can be done to minimize those risks may contribute to the "scare" factor. It should be emphasized at every opportunity that the nuclear industry is still one of the safest in the world in spite of a few highly publicized incidents. Specific statements regarding the methods used to accomplish this safety record, especially with respect to worker contribution, are necessary to back up the basic contention.

TAP-11

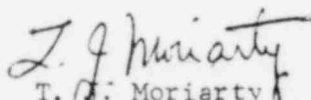
8008180315

Acknowledged by card. 7/25/80. mdy.

The tables and comparisons included are good. However, for group instructional purposes, a series of professionally produced slides could be made available, perhaps with a taped commentary or, as an alternative, a video-taped presentation covering each question. At Cape Canaveral Air Force Station and the Kennedy Space Center, we have found this approach to be eminently successful in training over 1,100 people on each of four different space programs involving large radioisotope power generators. Course recipients ranged in education from high school to doctoral level. All profited from the instruction which was due in large measure to the excellent illustrative material that captured the attention of those attending.

We have no comment on the Draft Value/Impact Statement.

Very truly yours,

  
T. J. Moriarty  
Project Manager, ETR