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Oil, Chemical and Atomic Workers International Union

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Reg. Guide

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Dr. A. Roecklein, Consultant
Office of Standards Development
U.S. Nuclear Regulatory Commission
Nicholson Lane Building - Room N109
5650 Nicholson Lane
Rockville, Maryland 20555

Re: Draft Regulatory Guide and
Value/Impact Statement

Dear Dr. Roecklein:

Thank you very much for the opportunity of presenting my comments on the above in person to you at our meeting. The following is a presentation of these comments in writing for the record. Enclosed is a marked up copy of the statement for your guidance.

First off, your guide appendix will make a valuable contribution in providing some uniformity in the instruction that workers receive concerning the dangers of ionizing radiation. Too often we hear reports from our members that radiation hazards are brushed aside by their supervisors and that the company instruction on the subject is very superficial.

In view of the fact that employers have a conflict of interest: production vs worker safety, OCAW recommends that courses of instruction be established which would be administered by agencies other than the employer. (See point 3 in OCAW resolution on nuclear power, copy of resolution enclosed.)

Detailed comments follow.

Footnote, page 1. Genetic effects not observed in humans. Have they been observed in animals? If so, the document should say so.

Page 5. Are not some radiotherapy patients getting cancer today? (Bross studies)

Acknowledged by card: *8-18-80 [signature]*

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Page 6, line 3. What do we mean by "clear cause-effect relationship". The workers are going to take it that the data do not infer risk from current levels of occupational exposure.

Page 6, line 13. Are we including exposure of the foetus among the offspring at exposed individuals?

Page 6, line 20. The figure of one-third comes from what? Animal studies?

Page 7, line 1. The statement about accidents should be expanded on. Most workers think that there have been no accidents.

Page 7, middle of paragraph 6. This material should be rewritten in view of the recent GAO review of theories of cancer causation.

Page 7, line 20. This is a debatable statement. An increased incidence of cancer at low radiation levels can be clearly inferred from studies at higher levels. This is like the tobacco industry saying that it has not been proved that cigarette smoking causes cancer.

Page 9, next to last paragraph. The work of Mancuso and colleagues who draw opposite conclusions should be mentioned. This is a controversial area and this paragraph fails to reflect the controversy.

First paragraph beginning on page 9. The same comment applies here and in the last paragraph on this page.

Page 13, table 2. No matter if it appeared in the literature where this table came from, the idea of life shortening from safest jobs (such as sociology professors) is plumb ridiculous. The standard of comparison in the table should be normal non-occupational living. Teaching of this type represents no shortening of life compared to normal living. The fact that this is compared with a thirty rem exposure makes the whole table look like propaganda.

Page 17, item 16, last line. Later on you point out that reducing the working times may increase the collective dose so that this statement looks inconsistent.

Page 20, paragraph 22, why don't you mention the names of those who did the "few studies" in line 2.

Page 21, last few lines. This sounds suspiciously like the kind of numbers that were put forward by industry against the lowering of exposure standards for vinyl chloride. The permissible exposures were lowered anyway and the costs to industry turned out to be trivial compared with the \$65 billion which were originally estimated. In making estimates of this kind no deductions are generally made for the saving in the direct economic

costs of cancer to the rest of society. This economic saving also was probably not taken into proper account in the NRC calculations.

Page 24, line 1. The point should be made that the worker must be accurately informed of the risks associated with radiation. Otherwise there can be no "informed consent". I think that this is the purpose of the guide.

First paragraph beginning page 24 is not clear and seems illogical. It should be rewritten.

The sections on internal exposure are too brief for such an important topic. Copy of an OCAW article on this subject is enclosed. The material in this article might be used as the basis for an expanded treatment of internal exposures.

Page 25, item 31. In my opinion this item makes a farce of the principle of informed consent. To force a welder into a high radiation area under the threat of job loss is compulsion having nothing to do with informed consent.

Page 26, item 32. Where workers are represented by a union, this should be listed as one of the places where workers can secure information on radiation.

Page 30, paragraph 1.2.4, penultimate sentence. The "over-concern" on the part of some workers is more than balanced by the under-concern of many others, particularly among those who have been inadequately instructed on radiation hazards. This is the very purpose of your guide. I think that the statement should be altered so that it presents a more balanced view.

Page 32. The possibility of the experience gained from a regulatory guide serving as the basis for some later NRC regulations should be mentioned.

The guide says nothing about problems with radiation monitoring or the probable errors of the practical measurements. The workers should be told that neutron exposure measurements are not very good and that the measurements of gamma radiation are not too accurate.

The workers should also be given some instruction as to the types and limitations of the various monitoring systems now available. The workers should receive some instruction of the wearing of monitors and their use in non-uniform radiation fields. Some appreciation of these factors would enable workers to take steps to reduce their actual radiation exposures, not just the recorded exposures.

Yours sincerely,

Frank

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Consultant

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