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UNIVERSITY HEALTH SERVICES  
HEALTH PHYSICS DIVISION

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July 14, 1980

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

Gentlemen:

Subject: USNRC letter signed by William J. Dircks,  
dated June 16, 1980

I would like to bring the above referenced letter to the attention of the Commissioners. As Chairman of the Radiation Protection Committee of the American Association of Physicists in Medicine, I have been reviewing the Nuclear Regulatory Commission's attempts over the past year to enact, in essence, a lowering of the permissible occupational exposure limits to radiation for medical workers. I am not directly affected as my institution, Yale University, does not have an NRC medical license. However, as a member of AAPM the majority of my professional colleagues are directly affected and it is in their interest that I am writing.

Although Mr. Dircks has disclaimers in his introduction the end result is a reduction in the permissible exposure for medical employees. We have several difficulties with this concept and approach.

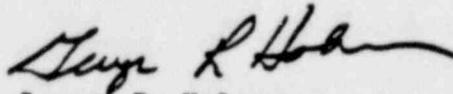
- 1) What should be issued to all licensees as a proposed change in the regulations open to public comment and review is being presented to the medical licensees as a letter stating hospitals must amend their license. There has not been an open solicitation of comments and no public hearings on this subject.
- 2) Does Mr. Dircks have the authority to personally change the regulations by stating, on page 2 of the enclosed letter, "After August 15, 1980 you will submit your program when you submit your next renewal or significant amendment application."?
- 3) It would appear that if the Nuclear Regulatory Commission is lowering what some people call maximum permissible exposures and others call the radiation protection guidelines, then it should apply to all licensees.

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- 4) There does not appear to be a clear scientific justification for presently lowering the exposure limits, at least from the present literature. If such a lowering of the limits is advisable then it is advisable for all including the general population limit (presently 0.5 rem/year).

I recommend the letter of June 16, 1980 be rescinded by the Commissioners. If such an ALARA approach is to be taken by the Nuclear Regulatory Commission then it should be published in the Federal Register for comment and apply to all licensees.

Very truly yours,



George R. Holeman  
Chairman, Radiation Protection Committee  
American Association of Physicists in  
Medicine

GRH:cm  
Enclosure

cc: Dr. C. Orton, AAPM  
Dr. R. Waggener, AAPM