INTERNATIONAL
BROTHERHOOD OF ELECTRICAL WORKERS

LOCAL UNION NO. 143

1501 REVERE STREET

HARRISBURG, PENNA. 17104

September 8, 1980

DOCKET BURGERS

DOCKET

Alan K. Roechklein
Occupational Health Standards Branch
Office of Standards Development
Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. Roecklein:

I am writing to comment on the draft regulatory guide "Instruction Concerning Risk From Occupational Radiation Exposure", which was published for comment in May of 1980. I want to take this opportunity to thank you for providing draft copies of the regulatory guide and attending a meeting with members of this Local Union for the purpose of receiving their comments and suggestions. As a result of that meeting I am certain that you left here with the distinct impression that the information contained in the draft regulatory guide is not only desirable, but extremely necessary for workers working in the Nuclear Industry.

Members of this Local Union have been employed at Three Mile Island Nuclear Generating Station before, during, and after the tragic accident March 28, 1979. We are not unlike other people of the general population, in that we had begun to take radiation hazards for granted. One of the things that the accident proved was the inadequacies of the training received by our Members working at Three Mile Island. This lack of training was evidenced by the numerous misconception, misunderstandings, and lack of appreciation for the relationship between exposure levels and assumed risks.

It is my firm conviction that the type of information contained in the new guide is desirable for the general populous, but vital for anyone working in the Nuclear Industry in order that they might perform their jobs without the burden of undue or unfounded fears. Certainly in the Nuclear Industry there is cause for concern for the health and safety of workers in this Industry, and I would not suggest anything to minimize or understate real hazards. However, after observing the fears and concerns that have been placed unnecessarily on people working at

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Alan K. Roechklein Nuclear Regulatory Commission

Three Mile Island as a result of improper or inadequate training phases, I can whole-heartedly endorse the concept that has been published.

Thank you very much for this opportunity to comment.

Sincerely,

George W. Sagle Business Manager

Local Union #143, IBEW

GWS/mr