

ROCKY MOUNTAIN ENERGY COMPANY

ENVIRONMENTAL SERVICES
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DOCKET NUMBER
PROPOSED RULE

PR *misc notice*
Reg Guide

September 30, 1980



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

Attn: Docketing and Service Branch

Re: Task OH 710-4; Task OH 941-4
"Health Physics Surveys in Uranium Mills"
"Information Relevant to Ensuring That
Occupational Radiation Exposures at
Uranium Mills Will be ALARA"

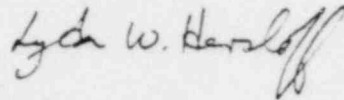
The following comment concerning the above listed draft regulatory guides concerns the Nuclear Regulatory Commission definition of ALARA. According to Task OH 710-4, ALARA will be met for airborne uranium and its daughters, if controls are in effect which reduce airborne uranium to 10% of maximum permissible concentrations (MPC) as given in Table I of Appendix B in 10 CFR Part 20. As was stated in previous comments on Task OH 941-4, there does not appear to be adequate scientific justification for recommending 10% of MPC_a as opposed to 25% of MPC_a for airborne uranium. Be that as it may, however, it further appears that in Task OH 710-4, the Lower Limits of Detection (LLD) recommended by the Nuclear Regulatory Commission are also defined as 10% of MPC for airborne uranium. This being the case, one can only assume that in the collective minds of the Nuclear Regulatory Commission, ALARA really means LLD. ALARA then really is dependent upon analytical capabilities of today's instrumentation and, therefore, might more honestly and accurately be called ALAD, as low as detectable! To further confuse the well intentioned philosophy of ALARA, it is stated in Task OH 710-4 "If uranium ore dust is present in quantities below 7.5 micrograms of uranium per cubic meter of air (i.e. below 10% of the ore dust limit), uranium ore dust may be considered to be not present..." For this source of airborne uranium in particular, therefore, the ALARA recommendations are suggested at a level which the Nuclear Regulatory Commission considers to be "not present".

The above considerations indicate a gross violation of the principle of ALARA, especially with respect to "reasonably achievable" when considering costs. Further, this kind of reasoning concerning ALARA attempts to reduce responsibility and

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risk of workers to zero, which is neither cost-effective or possible. The recent report by the Committee on the Biological Effects of Ionizing Radiation states, "Whatever the magnitude of these risks to society and to the individuals exposed, they must be kept in perspective if society is to derive benefits from the use of ionizing radiation." Perhaps in its haste to protect the worker from radiation, the Nuclear Regulatory Commission should consider the risk to society of its narrow perspective.



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cc: C. M. Bolser
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