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DOCKET NUMBER
 PROPOSED RULE *PR. Reg Guide*



October 21, 1980

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

Attention Docketing and Service Branch

Gentlemen:

We have reviewed the Draft Regulatory Guide and Value/Impact statement "Health Physics Surveys in Uranium Mills" (Task OH 710-4) and offer the following comments:

1. Proposed yellowcake contamination levels in restricted areas may be insufficient to satisfactorily protect against accidental ingestion, but in the absence of any data, we cannot propose other limits at this time. We believe bioassay results from a mill with routine contamination at the levels in the Draft Guide would routinely be high.
2. Rubber work gloves may protect against beta exposure but rubber surgical gloves won't. The Guide should specify that the intent is to have rubber work gloves rather than the thin surgical gloves used.

Basically, we believe the Guide represents a good and reasonable approach to health physics at uranium mills. It is very similar to the procedures we employ in our uranium operation in Texas. Subject to our comments above, we recommend its approval.

We appreciate the opportunity to comment on this Guide.

Sincerely,

L. M. Cook

cc: Mr. D. K. Lacker

Acknowledged by card *10/22/80*

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