

POCR ORIGINAL

DOCKET NUMBER
PROPOSED RULE PR-Misc Notice
Reg Guide

Secretary of the Commission
US Nuclear Regulatory Commission
Washington, DC 20585
Att: Docketing and Service Branch

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Gilbert /Commonwealth Co. Dept 2109
P. O. Box 1498
Reading, PA 19603
July 11, 1980

014902-H



Dear Sirs:

I was recently employed by Gilbert /Commonwealth as an engineering specialist in the nuclear department, and am currently working on shielding problems under a health physicist. I received my bachelor's degree in physics from the University of Pennsylvania in May.

As part of my orientation, I was asked to read your draft regulatory guide [014902-H] "Instruction concerning risk from occupational radiation exposure." While I was impressed with the quantity and nature of the information you propose to supply to workers in the industry, I found your answer to question 2b, "Why aren't medical exposures considered as part of a worker's allowed dose?" to be somewhat confusing on first reading, since the maximum occupational dose per quarter is earlier given as 3 rem. Assuming a good reason for this maximum, I'm sure the average worker will conclude, as I did, that a combined occupational and medical dose in excess of 4 rems for a given quarter would pose an unacceptable risk. Although your explanation rightly points out that the two types of exposure are independent as far as the potential risk presented by each, and that decisions concerning these risks should be made separately, I think additional explanation would help to clarify the situation for an individual such as myself, who has not received prior radiation safety training. Specifically, I would stress that 1) a dose on the order of 4-5 rem over a 3-month period is not especially dangerous in and of itself, and 2) that this larger than normal quarterly dose is not especially significant when evaluated with respect to the cumulative lifetime dose.

Thank you for your attention. I hope my comments are of some help.

Sincerely,

Sandra S. Musser

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