

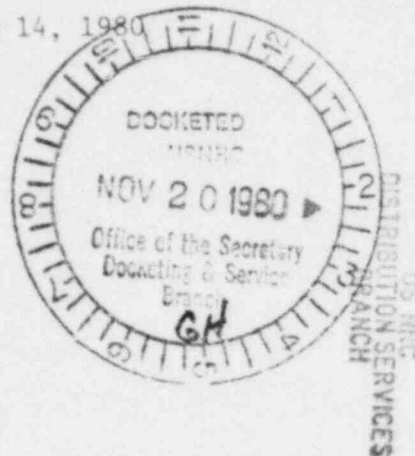
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RADIATION BIOPHYSICS
THE UNIVERSITY OF KANSAS
Lawrence, Kansas 66045

DOCKET NUMBER **PR20**
PROPOSED RULE **45FR67018**
Phone: (913) 864-3867

Nuclear Reactor Center
West 15th Street

November 14, 1980



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

ATTN: Docketing and Service Branch

Gentlemen:

Ref: Docket No PR 20 (45FR 67018)

As Radiation Safety Officer and Director of the Radiation Biophysics Program at the University of Kansas, I have been deeply involved in the safe use of radiation sources and have been involved in teaching a course on the effects of low levels of ionizing radiation. In the latter role I have studied most of the available literature on the effects of low levels of radiation. The level of risk associated with the C-14 and H-3 radionuclides at tracer levels in research projects is so low that greater risks may well be encountered if regulations such as those proposed under Docket PR 20, are not passed.

The proposed rules in their entirety support procedures which, in my opinion, will reduce the overall risks as they are encountered under the current existing regulations. [For example, the (non-radioactive) transportation risks associated with shipping these wastes thousands of miles outweigh the risks associated with the alternatives provided under the proposed changes.]

I fully endorse the proposed changes in 10 CFR 20.

Sincerely yours,

Benjamin S. Friesen
Benjamin S. Friesen
Radiation Safety Officer and
Director of Radiation Biophysics

BSF/slr

Acknowledged by card... *11/20/80*

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