



RADIOLOGICAL CONTROL OFFICE

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PROJECT NUMBER

PROPOSED RULE

PR-19,20(44FR 10388)

26 Mar '79

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

Attn: Docketing & Service Branch

Subject: Eliminating accumulated dose averaging formula (N-18) x5 rem;
comments on

Ref: (a) Federal Register, Vol 44, No. 35 - Tues, 20 Feb '79

Ref (a) requested comments on proposed amendments to regulations relating to radiation exposure criteria. As a certified health physicist with over 30 years experience in radiation protection, I consider myself well qualified to comment.

It has always been my understanding that any regulatory requirements for occupational radiation exposure control are not nor will be limits defining the boundary between harm and no harm. Rather, they are guide lines that can be used to judge the effectiveness of the radiation user's radiation protection program. This is certainly an acceptable regulatory function. However, it is most important that these regulatory requirements do not restrict the qualified expert (certified health physicist or equal) in providing operational criteria that balances benefit vs risk judgments in certain limited radiation use situations. In my mind, the use of the dose averaging formula was one way in providing such flexibility.

However, this arbitrary guide line is not the only way such flexibility can be provided. Therefore, it is my recommendation that if the (N-18) x5 rem criteria is to be eliminated, then it is mandatory that some criteria be included in the regulations that establishes the procedure for waiver of the 5 rem annual limit. This waiver need not be automatic (as the present (N-18) x5 rem rule), but could even provide more flexibility for those special cases where



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Acknowledged by card.....

MASSACHUSETTS INSTITUTE OF TECHNOLOGY
MEDICAL DEPARTMENT
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PROPOSED RULE PR-19,20(44FR10388)

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

Attention: Docketing and Servicing Branch

Gentlemen:

I wish to submit comments regarding the Proposed Rules published in the Federal Register (Vol. 44, No. 35), dated 20 February 1979.

I am in favor of the proposed elimination of the accumulated dose averaging formula 5 (N-18) and the associated Form NRC-4. Also, I approve of the proposed section 20.101.

However, I think that the proposed section 20.102 needs to be revised in order to make it practical to comply with its provisions. The difficulty is that its provisions do not allow for the situation whereby the individual does not know his prior dose. It has been our experience that individuals who have had previous work with radiation usually specify "unknown" when asked to state their prior dose.

Therefore, the following alternate revisions are suggested:

- 1) After item (b) insert on item (c) which reads as follows: "or (c) that an individual states that the prior dose is unknown to the individual".
- 2) Or, alternatively, it is suggested that item (b) of proposed section 20.102 be revised so that, for individuals who have had previous work with radiation sources, the licensee is allowed 60 days to obtain dose histories from previous employers.

I hope the above comments will be helpful.

Sincerely,

S. Levin

Samuel Levin
Radiation Protection Officer

Not acknowledged by card.....

SL:bh

Dupe of 79042 10150 (LPG)