



**IBEW**

1125-15th St. N.W.  
Washington, D.C.  
20005

March 12, 1979

DOCKET NUMBER  
PROPOSED RULE PR-19,20 (44 FR 10388)



Mr. Samuel J. Chilk, Secretary of the Commission  
US Nuclear Regulatory Commission  
Washington, DC 20555

Attention: Docketing and Service Branch

Dear Mr. Chilk:

This is in response to the proposed rule change (10 CFR Parts 19 and 20) published in the Federal Register, Vol. 44, No. 35 - Tuesday, February 20, 1979.

The IBEW does not agree with the proposed rule change which would eliminate the accumulated dose average formula, 5(N-18). The IBEW believes that the accumulated dose average formula serves a useful purpose in reducing total occupational exposure. As such it serves a useful function.

Most annual exposures exceeding 5 rem occur to bargaining unit personnel including many represented by the IBEW. Less than one-half of one percent of all licensee exposures exceed 5 rem per year.

Certain skills required for maintenance of power reactors are in short supply, i.e., N-welders. N welding is an art that all welders cannot master. Welding is an essential procedure.

Exception for essential procedures must be provided. The accumulated dose average formula is a method by which an exception may be granted.

You will recall that our president, Charles H. Pillard, addressed this subject in his letter of May 24, 1978, to NRC Chairman Hendrie. The pertinent quote on this subject follows:

"Within the philosophical framework of ALARA, it would be possible for an individual in rare cases (i.e., a critical skill such as an N-welder) upon justification to receive occupational radiation exposure in excess of 5 rem per year (3 rem/quarter) if permitted by 5(N-18). Justification for exemption of

8105270 508

Transmitted by card

3/16/79

Mr. Samuel J. Chilk, Secretary of the Commission  
March 12, 1979  
Page Two

the 5 rem per year individual exposure should  
require prior NRC approval."

Nuclear power is essential for national well being. Lack of a  
mechanism to grant an exception to a worker with a critical skill may  
mean lack of electrical energy for a nation which faces an energy crisis.

The IBEW is an organized labor union with over a million members  
working in all areas of the electrical industry. This includes licensee  
activities where they receive occupational radiation exposure.

Of the fifty nuclear power stations with units licensed to operate  
(72 units) the IBEW represents the bargaining unit at thirty-three  
stations. Some 6,000 members are permanently assigned to the various  
stations. Tens of thousands of members rotate thru all the stations  
for required maintenance and service. These members include utility  
employees, contractor employees from the building trades, and vendor  
specialty crew employees. Additional thousands of members receive  
occupational radiation exposure at their places of work from nuclear  
devices and processes.

The IBEW requests that the NRC retain the accumulated dose average  
formula as a mechanism to grant exception for essential procedures. The  
IBEW further requests that the NRC be the only party authorized to grant  
exception to the accumulated dose average formula after examining the  
petition of the licensee for such exception.

Very truly yours,

Paul R. Shoop  
International Representative  
Utility Department

PRS:sab