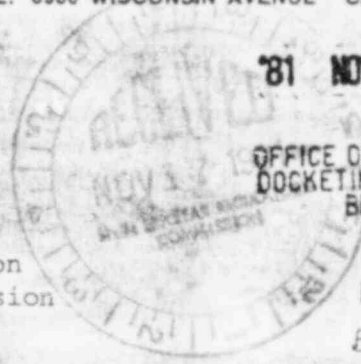




AMERICAN COLLEGE OF RADIOLOGY: 20 NORTH WACKER DRIVE CHICAGO, ILLINOIS 60606 (312) 236-4963
 WASHINGTON OFFICE: 6900 WISCONSIN AVENUE CHEVY CHASE, MARYLAND 20015 (301) 654-6900

DOCKETED
 '81 NOV -3 P2:53

29 October 1981



OFFICE OF SECRETARY
 DOCKETING & SERVICE
 BRANCH

emp

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

DOCKET NUMBER
 PROPOSED RULE

*PR-Misc. Notice
 (Regulatory Guide)*

Attention: Docketing and Service Branch

Gentlemen:

The following comments are offered on behalf of the radiologist and physicist members of the American College of Radiology with regard to the August 1981 draft of proposed revision 2 of your regulatory guide 8.13. The draft was reviewed for the College by its Radiation Advisory Committee and members of other appropriate committees. These physicians and scientists are radiation authorities in their own capacities. Some of them have served as members of advisory committees to the NRC and other federal agencies, as well as the NCRP and other scientific bodies.

In general, the ACR applauds the draft and urges its completion. We recognize that explaining the theories, assumptions and programs for radiation hygiene is a difficult task when addressing scientists. This draft accomplishes the task at a level which should be intelligible and valuable to the audience it is intended to reach. If the NRC will advise us of final publication, we will call its availability to the attention of our members.

Our reviewers did call attention to two items which might deserve further attention. At page 8.13-10 in the third paragraph, the first sentence asserts that "Radiation also can be harmful to an unborn baby at doses that would have little or no effect on adults." Our reviewers have noted that the support for such a statement is derived entirely from animal studies. Further, since the next sentence then cites higher doses, we are left uncertain from the sentence what magnitude of dose is meant and what gravity of harm is inferred. Perhaps this could be rewritten to help the scientists more and the lawyers less.

At page 8.13-17, your paragraph 1.3.2 refers to a pending guidance document from the Environmental Protection Agency. In our testimony to the series of hearings which EPA conducted earlier this year, this organization took strong exception to the need for and thrust of the EPA proposals. The present approach is much to be preferred.

8111180544 811029
 PDR REGGD
 08.013 C

PDR

Acknowledged by cert.

11/4/81... emp

*DS09
 5/10*

Add: Ed Hill

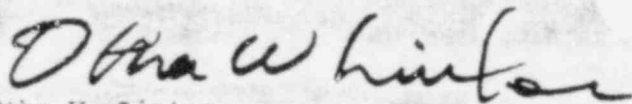
Secretary of the Commission

Page 2

29 October 1981

Also, we call to your attention the publication since your draft was completed of a background publication from the Food and Drug Administration (FDA 81-178) which discusses another aspect of radiation exposure of pregnant women. A reference to it might be helpful to your readers who may find themselves encountering both occupational and medical radiation exposures during pregnancy.

Sincerely,

A handwritten signature in cursive script that reads "Otha W. Linton". The signature is written in dark ink and is positioned above the typed name.

Otha W. Linton

Director of Governmental Relations

OWL:js