

OSD

AUG 30 1978

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Dr. Rosalie Bertell
151 East Street
Buffalo, New York 14207

Dear Dr. Bertell:

This is in response to your letter of July 18, 1978, requesting the Commission to amend its regulation "Standards for Protection Against Radiation," 10 CFR Part 20.

In your letter you request the Commission to amend its standards for protection against radiation as they apply to the maximum whole body dose equivalent for occupational exposures to ionizing radiation. You state that the requested amendment would have the same effect measured by the reduction of the individual's biological ability to cope with chronic and malignant disease, as would be achieved by reducing the current maximum permissible whole body dose equivalent for occupational exposure by a factor of fifty.

You request that 10 CFR Part 20 contain specific mention of those diseases which indicate above normal susceptibility to leukemia and/or radiation damage as reported in the journal article and testimony attached to your petition. You state also that preemployment screening and notification of employees when such indicator diseases are diagnosed should be mandatory and work in restricted areas should be curtailed or eliminated for the susceptible individuals.

You request that the rule making hearing convened in response to your petition be consolidated with that requested by the NRDC (PRM-20-6), and that the date for a formal adjudicatory hearing to reduce Federal radiation standards be set within 6 months of receipt of your petition.

This request is considered a petition for rule making as provided in 10 CFR 2.602 of the Commission's regulations. The petition has been docketed to recognize your request for amendment of the Commission's regulations and has been assigned Docket Number PRM-20-6A. A notice of the petition and request for comments has been published in the Federal Register (copy enclosed).

As staff review progresses on your petition, it may be necessary to request additional information. Please reference the assigned docket number on any correspondence you may have concerning the petition. Upon

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Dr. Rosalie Bertell

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expiration of the comment period we shall furnish you with copies of any comments which have been received in response to the notice of filing of petition for rule making.

Sincerely,

(Signed) J. M. Felton

J. M. Felton, Director
Division of Rules and Records
Office of Administration

Enclosure:
Federal Register Notice

CENTRAL FILE
DRR SUBJ
DRR RDG
GLHUTTON
JMFELTON
EPLEASANT
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OFFICE	ADM-DRR	ADM-DRR				
SURNAME	GLHutton/BK	JMFelton				
DATE	8/29/78	8/29/78				