



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

JAN 10 1979

Note to Bob Alexander

COMMENTS ON EPA WORKING DRAFT OF FEDERAL GUIDANCE ON OCCUPATIONAL EXPOSURES

Our cursory review of this document has resulted in the following comments.

1. The premise for the decision to recommend changes in the 1960 FRC guidance is that the maximum overall lifetime risk of radiation-induced cancer and genetic effects is higher than average risks of accidental death in some other occupations (p. 46). This confuses apples and oranges.

ICRP in Report 26 clearly states that its annual occupational dose equivalent limits (50 mSv) "...are primarily intended to ensure adequate protection even for the most highly exposed individuals" (Para. 101, emphasis added). Further, if a large fraction of workers were to receive, on a planned basis, dose equivalents approaching the annual limit, the result that will be of concern will be the rise in average risk (para. 102).

2. Under current regulations, occupational dose limits do not include contributions from internal sources. NCRP recommendations cover radiation from all sources (NCRP 39, para. 229-232). ICRP gives this matter special consideration (ICRP 26, para. 110).

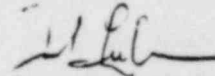
It is implied in the EPA paper that external and internal source contributions will be combined (e.g., p. 2, last sentence and p. 65, 1st para), but the discussion of occupational exposure history (Chapter 3) seems limited to external sources. No clear statement appears to have been made, however. Clarification is needed on this important point.

3. It is implied, but not directly stated, that prior authorization by a regulatory agency will be needed to expose persons to occupational doses in excess of 0.5 rem per year (p. 61, last 4 lines). This is a most significant recommendation and the report should not be ambiguous on it.

4. If EPA is recommending combining doses from external and internal sources and/or is recommending obtaining prior authorization for exceeding 0.5 rem per year, then their recommendations can hardly be described as "primary(ly)...structural in nature... (and) minor modification of radiation protection concepts." (p.3, 2nd para.). These changes will have profound implications and EPA has not made a case for them.

We also have serious questions concerning other issues, e.g., the deletion of special limits for extremities, but those may be of secondary importance, given the above comments.

I would be quite interested in learning of the nature of discussions and outcome of the interagency EPA meeting on this draft this afternoon.



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