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(47 FR 5140)

Secretary of the Commission,
US Nuclear Regulatory Commission,
Washington, D.C. 20555
Attn: Docketing and Service Branch

'82 DEC 16 A11:44

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

Re: Comment on "Authority for Copying of Records...", proposed rule

Dear Sir:

In principle your proposed rule seems reasonable; in fact during recent inspections here the inspectors have requested copies of certain (specified) documents which we were happy to furnish.

However, there is one area of concern which your proposal brings to mind. This is a matter of how these copied documents once in the hands of the N.R.C. will be treated. Although these documents are in general not very exciting, some might be considered sensitive or embarrassing if they were to be made public. In general, hospital documents are not proprietary in the usual commercial sense; nevertheless they could do a hospital considerable harm if they are publicised in the wrong way. My concern is that hospitals will become very defensive in terms of the sort of documentation that will be on file if they feel these documents may be made public. In Illinois we recently had an example of the complete x-ray enforcement files of the state agency apparently being open to the press with the result of specific institutions and personnel being named on the local news in a most unfavorable light.

It would seem that accurate and frank documentation of activities are in the best interest of radiation safety. However, although most hospitals are not ashamed of their activities, their candor will certainly be diminished if they feel an "investigative reporter" or a lawyer is a silent reader.

This letter is the opinion of the undersigned only and not necessarily that of Cook County Hospital. The concern expressed is not specific to this Hospital either, rather, it is generic to medical institutions.

Sincerely,

Lincoln B. Hubbard
Lincoln B Hubbard, Ph.D.
Rad. Safety Officer

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Acknowledged by *1/4/83 emp*