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PROPOSED RULE PR 20  
(59FR4868)

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OFFICE OF SECRETARY  
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Re: Initial comments on the NRC Staff's Draft Revision of  
10 CFR part 20 dated 1/26/94

The following are initial comments on the NRC Staff's Draft Revision of 10 CFR part 20 dated 1/26/94. Additional comments will be filed as soon as possible and as often as necessary.

*Background Radiation* This is the most unsettling beginning I could have imagined. Background radiation is cosmic and terrestrial radiation that occurs naturally. The fact that homo allegedly sapiens contaminated the whole planet with fallout and accident debris is no reason to lump all radioactive material in the biosphere as "background." It could be argued that radon belongs here, but as I wrote in my follow-up comments, radon gives a very specific kind of dose to a small part of the body. Radon's dose is not like the cosmic and terrestrial doses to which all are exposed. It should be reported separately and in radon-appropriate units.

*Critical Group* The Staff does not say how this is to be defined. A broad definition would suit a licensee or succeeding occupant nicely. The maximally exposed individual, in whom the NRC Staff has no apparent interest, could be sent into quite risky territory, secure that the average dose to the large Critical Group would not be unduly perturbed. Furthermore, there is nowhere any suggestion in your document that the members of any group of later users of a "decommissioned" site (restricted or unrestricted) be regularly monitored. So the entire Staff proposal is a charade. There's an ill-defined critical group, which will not be monitored, and its average calculated dose must not be too large. Any individual in the group may receive a large dose, provided a paper case can be made to assert the unmeasured average dose is within bounds.

*Site Specific Advisory Board* The Staff proposes to allow the licensee to select the members of the local oversight committee. What model could be more prone to abuse? What could possibly induce a licensee to select the local, outspoken, technically literate critic of the plant or the program?

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