



in Reply 55

UNITED STATES
NUCLEAR REGULATORY COMMISSION
ADVISORY COMMITTEE ON REACTOR SAFEGUARDS
WASHINGTON, D. C. 20555
August 27, 1979

D. W. Moeller, Chairman
Radiological Effects and Site Evaluation Subcommittee

SUBJECT: REVISION OF 10 CFR 20

REF: J. W. HEALY LETTER OF AUGUST 1, 1979

ATTACHMENTS: Copy of J. W. Healy Letter 8/1/79
Tom Murphy's Letter 8/20/79

As indicated in the attached letter from Tom Murphy, Bill Dircks initiated the formation of an NRC Task Force to update 10 CFR 20 by his memo of July 10.

A list of twenty-one shortcomings of the existing regulation is included in the attached correspondence.

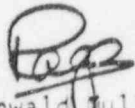
So far, the task force has had one meeting. Bob Baker's summary of that (Aug. 16) meeting is included in the attached correspondence.

A meeting of NRR affected persons is scheduled for tomorrow. The next meeting of the task force is scheduled for Thursday, August 30.

It will be some time before the task force's work would be ready for ACRS review and comment, but if you feel it is worth while, we can schedule a discussion of the task force's progress and plans at a meeting of the Radiological Effects and Site Evaluation Subcommittee in about six months.

Meanwhile, of course, individuals will have an opportunity to submit comments and suggestions in response to the Federal Register Notice which the task force is preparing.

It appears that the update of 10 CFR 20 which Healy suggested is already underway.


Ragnwald Muller
Senior Staff Engineer

Attachments:
As stated

cc: ACRS	A. Grendon	T. D. Murphy
R. F. Fraley	H. M. Parker	R. Alexander
M. W. Libarkin	F. L. Parker	R. Baker
T. M. McCreless	J. W. Healy	Fellows
R. F. Foster	J. N. Stannard	D. A. Orth
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August 1, 1979

Dr. Dade Muller
c/o Mr. Ragnwald Muller
U.S. Nuclear Regulatory Commission
Advisory Commission on Reactor
Safeguards
Washington, D.C. 20555

Dear Dade:

I am writing to suggest that the ACRS review the present AEC regulations given in 10/CFR 20. As you know, these regulations use the MPC's issued by the ICRP and NCRP in 1960 as their basic control on internal emitters. That is, for workers the limitation is 40 MPC-hours in one week without regard to the radiation dose actually received. In fact, dose to organs is not mentioned. Aside from the fact that this procedure does not account for the possibility of absorption through the skin, I have two other concerns.

1. The MPC's used are now 20 years old and do not account for much of the information accumulated in this time. Also, the ICRP will soon be coming out with a new internal dose document. While I hope that the NRC will not adopt these numbers, the possibility does exist.
2. I have been recently involved in a legal case where the question of whether the NRC regulations for inhalation had been exceeded. Because the NRC regulation was based only on air concentration, it was difficult to decide even though the estimated dose in the week of exposure was only 0.5 mrem.

I believe that a move should be started to revise 10CFR 20 using basic limits of organ dose and delegating the MPC's to tertiary standards. This would permit use of present technology on measurement of quantity in the body and would eliminate unnecessary legal tangles.

If I can help you on this or give further information, please let me know.

Sincerely yours,

J. W. Healy

JWH:dl

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