

June 1 -85
from the pen of EMERY NEMETHY

DOCKETED
USNRC

EMERGENCY ALERT

DOX-411
BLOOMSBURG 17615

'85 JUN -3 P12:20

Sec'y - NRC

ATT: DOCKETING &
SERVICE BRANCH

Re: Proposed Rule -
Extraordinary Clear Occur-
rence - Fed Reg 59-85,
p 13878

Gentlemen =

We endorse Commissioner Bernthal's proposal.

The idea of using a fixed dose rate, measured 1 meter from the ground surface, to establish whether there has been a "substantial discharge" of radiation seems to us logical, simple, and easy to determine.

We do have a question about the rate he proposes - 10 millirad/hr (p 13983, col 3). Should this read one-tenth millirad/hr?

He says studies show decontamination should be required if the integrated dose over 30 years will exceed about 25 rem.

30 years = 262,800 hours. When you divide this into 25 (rem) you come up with the figure of .0001 (rad) approximately.

Can present detectors measure this rate of radiation?

Sec'y

DS1010
add: H.T. Peterson
113055

JUN 3 1985

Acknowledged