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Blue Ball, PA February 5, 1986

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Secretary of the Commission Attention: Docketing and Service Branch U. S. Nuclear Regulatory Commission Washington, DC 20555

OPE ERAN.

Dear Ms. or Mr. Secretary:

I am writing to comment on your incredible proposed "Standards for Protection Against Radiation," 10 CFR Parts 19, 20, 30, 31, 32, 34, 40, 50, 61, and 70 as enunciated in the January 9, 1986 Federal Register. These proposed standards seem to be the handiwork of gnomes left over from that ultimately redundant and self-perpetuating service organization: NRC's Office of Standards Development. I thought you guys got smart and junked that office in 1981. Now I learn that you just hid the damn thing in your Office of Nuclear Regulatory Research. My contacts inside NRC tell me that the Office of Nuclear Regulatory Research is devolving into the Office of Standards Development because the research office has been taken over by managers who came from standards and would not know research if it slapped them smack in the face. These new standards show something else: they do not know much about standards either.

You just do not develop standards because there is nothing else to do. What I am getting at is: what was wrong with the old radiation protection standards that caused you to believe that you needed new ones? According to your Background section in your FR notice, advances in probabilistic risk analysis and the advent of fast computers form the justification for toying with these standards. Big deal. Good old PRA, as too often practiced, is just a numerological game that is played when the players can not or will not understand real world effects, things like physics, chemistry, and biology for example. Computers just make these games easier to play. Computers are not gods and they are not intelligent, they only do what they are told. Nothing in your FR notice gives me any confidence that you guys know how to combine probability, statistics, physics, chemistry, biology, etc. into a mathematical formalism that might shed some light on radiation hazards.

Your standard reflects too much emphasis on health physics which is often based on models which have no relationship to reality. What about epidemeology? What about the paucity of data in the radiation protection field? How many people have really ingested Americium? Enough for meaningful data analyses? I see nothing in these proposed standards which addresses the issue of the interaction of nonradiological hazards with radiological hazards. I could go on, but I think I have made my point.

Why did you bother with this proposed rulemaking? If you wanted radiation protection standards to be self destructive, then this was a good way to go. Otherwise, I suggest that you stick with the old standards.

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Acknowledged by sard