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PR-19, 20, 30 et al.
(50 FR 51992)

(102)

RICHARD F. CELESTE
Governor

May 5, 1986

Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, DC 20555

ATTN: Docketing & Service Branch

Gentlemen:

This is in reference to the Federal Register Notice of January 9, 1986 announcing the proposed revisions to 10 CFR 20, et al.

Overall I think this is a major improvement in NRC radiation protection standards. I wish to commend particularly:

- * The sum of 5 rem annual whole body occupational dose limit (20.201(a)(1)(i)),
- * The sum of 15 rem annual lens of the eye limit (20.201(a)(3)(i)),
- * The sum of 50 rem to an organ or tissue other than the lens of the eye (20.201(a)(1)(ii)),
- * The 0.5 rem dose to the fetus (20.208),
- * The 0.001 rem collective dose provision (20.304),
- * The use of DAC's based upon ICRP models and other data (20.201(d)).

I think the 0.5 rem fetus dose is particularly important for the NRC to be consistent with current scientific recommendations. I strongly urge that this standard be included in the final regulation.

I am concerned with the implementation of the reference level (20.303). As written this may defacto become a new dose limit of 0.1 rem to individuals in the general public. This would have particular significance to existing x-ray facilities which were designed at the 0.5 rem standard.



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add: RE Alexander, 1130 SS
G. Bleser, 9005 MNP
Wm. Alstead, 9609 MNP

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Acknowledged by card..... MAY 9 1986 pd

Secretary of the Commission
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While I can understand the difficulty of switching in total to SI units, I find it paradoxical that the U.S. and only two other minor countries do not use SI units.

Sincerely,

A handwritten signature in dark ink, appearing to read 'R. M. Quillin', with a long horizontal flourish extending to the right.

Robert M. Quillin, CHP
Radiological Health Program Director

RMQ/ka