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Feb. 15, 1994
(8)

NON-DESTRUCTIVE TESTING MANAGEMENT ASSOCIATION

September 25, 1996

Mr. David L. Meyer, Chief
Rules Review and Directive Branch
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: NUREG/CR-6112 BNL-NUREG-52394
IMPACT OF REDUCED DOSE LIMITS ON NRC LICENSED ACTIVITIES

Dear Mr. Meyer:

The Non-Destructive Testing Management Association (NDTMA) submitted comments by letter dated July 6, 1994 on behalf of the industrial radiography industry in response to the Nuclear Regulatory Commission's NUREG/CR-6112 Draft Report for Comment, IMPACT OF REDUCED DOSE LIMITS ON LICENSED ACTIVITIES. The comments were prepared by the Government and Industry Affairs Committee (GIAC). The purpose of this letter is to request an update on the report. In addition, please inform us whether or not NDTMA's comments had an impact.

The summary of our comments were as follows:

IMPACT OF REDUCED DOSE LIMITS

It is anticipated that any reduction in dose limit below the existing 5 rem/yr limit will increase (1) collective workforce dose, (2) size of workforce, (3) cost to modify facilities, (4) cost to purchase equipment, (5) cost of radiation protection, and (5) overall operating cost of business. We also anticipate that any reduction in dose limit below the existing 5 rem/yr limit will decrease average worker training, skill, experience and productivity and will cause a corresponding increased risk of accidental acute overexposures. In addition, some types of radiography work will be difficult to do with reduced dose limits.

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GENERAL OBSERVATIONS ABOUT THE NRC DRAFT REPORT

- A. The radiography industry has not been adequately represented in any of the studies referenced.
- B. The reduced dose limit recommendations from NCRP, ICRP, and EPA are based on reports from RERF, BEIR, and UNSCEAR. All the reports are based on fatal cancer risks. None appear to consider the increased risk of acute overexposure due to accidents.
- C. The data gathering studies by EEL, DOE, NRC, and EPA focused on the impact of reduced limits on all monitored workers. There was not enough focus on the impact on the most productive, trained, skilled and experienced key workers.
- D. The NRC 10 CFR Part 34 radiography regulations recently adopted reduced dose limits and additional ALARA requirements. Radiography licensees will need a few years to evaluate the impact of these changes. It is too soon to provide an accurate estimate of the impact of additional reductions in dose limits.

Please advise us if additional information from the industrial radiography industry would be helpful. This topic is extremely important to the Nondestructive Testing (NDT) industry and we are eager to participate in any further consideration of reducing dose limits.

Sincerely,

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