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DRAFT NV/HEG EVALUATION

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This memorandum is in regard to the draft NV/HEG evaluation paper of January 21, 1966.

There may continue to be some misunderstanding of the proper interpretation and use of the 3.9 R whole body exposure. The text of the NV/HEG evaluation report is correct in its interpretation of this point. However, in abstracting this for the purpose of Table I on page 3, there leaves a possibility for some misunderstanding if one were to read this table only. Although it would require a few more words, I suggest that further description of the 3.9 R be included in Table I.

To further insure that we all do understand the interpretation of 3.9 R, it is not the intent that this be a number that may be deliberately approached in increments. This incremental approach is appropriate, for example, when interpreting radiation exposure criteria for an atomic energy worker in a plant. However, the 3.9 R for off-site exposure should be interpreted exactly as given in Dr. Nathan Woodruff's memorandum of August 1, 1962 addressed to you.

In addition to the 3.9 R, we should always keep in mind that there is a companion criterion of 10 roentgen in 10 years. It was a deliberate decision at the time I recommended this criterion not to attempt to prescribe limits of exposure for any single year in order to provide some flexibility in operations. However, I am sure that we all understood and appreciated that the more one deviates upward from the 1 R average in any one year the more becomes our problem of defending such an action. With these thoughts as a background, I would like to add that I have no objection to the additional criterion suggested in NV/HEG evaluation paper of 1/2 roentgen per event for planning purposes. However, I believe that this should be used only as an in-house guide and not as a publicly announced additional guide for the Atomic Energy Commission. If the latter course of action were taken, it might lead to unnecessary problems including the possible requirement of having to stand up in open court and defending still another safety criterion. I appreciate fully the necessity for the operations people to have guides for planning purposes and do not offer any objection to the proposed 1/2 R per event, but let us keep it in-house.

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