

STATE OF ILLINOIS  
**DEPARTMENT OF NUCLEAR SAFETY**

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Gary N. Wright  
Director

**DOCKET NUMBER**

**PETITION FILE #** 20-25  
(68FR 23618)

May 4, 2003

**DOCKETED  
USNRC**

June 10, 2003 (11:13AM)

Secretary  
U. S. Nuclear Regulatory Commission  
Washington, DC 20555-0001  
Attn: Rulemakings and Adjudications Staff

**OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF**

**SUBJECT: PRM-20-25 Petition for Rulemaking 10 CFR Part 20**

The Illinois Department of Nuclear Safety (IDNS) has reviewed the subject Petition for Rulemaking and submits the following comments.

1. While IDNS agrees that it is generally desirable for dosimetry to be NVLAP accredited, there are certain situations where NVLAP accreditation is impossible. For example, NVLAP accreditation is not available for all neutron fields. Adoption of the petitioner's proposal would leave no compliance option for licensees with radiation fields beyond the standard NVLAP parameters.
2. The petitioner does not propose a satisfactory solution for backup dosimetry. Although the petitioner points out that certain licensees issue redundant dosimetry to their personnel, that does not completely eliminate situations where the primary dosimetry is lost, contaminated, or otherwise not useable. In these cases, the licensee must still assign a dose of record and should be able to do so using secondary non-NVLAP dosimetry. USNRC or Agreement State inspectors should carefully evaluate the use of secondary dosimetry for compliance purposes.
3. The petitioner makes the argument that the mandatory use of NVLAP dosimetry would somehow require licensees to better evaluate dosimetry use conditions and ensure that appropriate dosimetry is employed. We disagree. Although the proper matching of a personnel dosimeter with use conditions and radiation fields is critical to proper dose assignment, the mandatory use of NVLAP devices would not address this problem. Only the USNRC or



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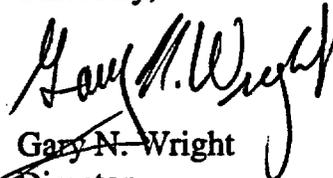
Page 2

May 4, 2003

Agreement State inspector is in a position to evaluate whether the licensee has made the correct choice.

In summary, IDNS does not support the petitioner's argument and requests that USNRC not make the petitioner's proposed changes to Part 20. Thank you for the opportunity to comment on this petition.

Sincerely,



Gary N. Wright  
Director

GNW:tlk

**U.S. Nuclear Regulatory Commission**

**Page 3**

**May 4, 2003**

**bcc: Gordon Appel  
Richard Allen  
Steve Collins  
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