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RECORD #49

TITLE: 10 CFR 20.102 - Determination of Prior Radiation Dose

FICHE: 38299-076

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JUN 30 1980

MEMORANDUM FOR: A. B. Davis, Chief, FFMS Branch, Region III

FROM: Leo B. Higginbotham, Assistant Director, Division of Fuel Facility and Materials Safety Inspection, IE

SUBJECT: 10 CFR 20.102--DETERMINATION OF PRIOR RADIATION DOSE

Reference: Memo Fisher to Higginbotham, 4/23/80

You asked for guidance on the statement in 20.102(c)(1) that "...the licensee shall make a reasonable effort to obtain reports of the individual's previously accumulated occupational dose."

a. Who may (or must) the licensee obtain these reports from (i.e., previous employer or worker)?

If the worker has a copy of his record and attests that it is a complete record, I believe that it is reasonable for the licensee to accept that without further question, providing the licensee is satisfied it is a complete record. Aside from the requirement in NRC regulations, the licensee should be mindful of protecting himself in matters that may arise later and perhaps request a certification from the worker that it is a complete record. The consideration here is, that if the worker (for some reason) would want to conceal or be untruthful about prior work experience, it would be unreasonable to require the licensee to do a complete background or verification check on the employee.

If the worker does not have a complete record, the licensee should, from information supplied by worker, check with former employers to obtain the history of radiation exposure.

b. What type of report is required (i.e., telephone call, hand-carried history, mailed history, etc.)?

I believe the "hand-carried history" is covered in a., above. A telephone call to former employers would suffice as an interim measure if there are time pressures for the licensee to put the guy to work, but a written record should be requested to confirm information obtained in a telephone call. I believe the "mailed history" question is answered by the above discussion.

A. B. Davis

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If the licensee is unable to obtain a "complete" history from telephone or written inquiries (the number of which he determines may be reasonable, i.e., the effort involved by him), then his only alternative is to assign prior exposure according to the values in the table in 20.102(c)(1).

Leo B. Higginbotham
Assistant Director
Division of Fuel Facility and
Materials Safety Inspection, IE

cc: G. W. Smith, Region I
J. P. Stohr, Region II
G. D. Brown, Region III
H. G. Book, Region V

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION III
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April 23, 1980

MEMORANDUM FOR: L. B. Higginbotham, Chief, Fuel Facilities and
Materials Safety Inspection, IE

THRU: *AB* A. B. Davis, Chief, Fuel Facility and Materials
Safety Branch

FROM: W. L. Fisher, Chief, Fuel Facility Projects and
Radiation Support Section

SUBJECT: INTERPRETATION OF 10 CFR 20.102 DETERMINATION OF
PRIOR DOSE

Please provide the requested guidance for preparation of form NRC-4.

10 CFR 20.102(c)(1) states that "the licensee shall make a reasonable effort to obtain reports of the individual's previously accumulated occupational dose."

1. Who may (or must) the licensee obtain these reports from (i.e., previous employer or worker)?
2. What type of report is required (i.e., telephone call, hand carried history, mailed history, etc.)?

W. L. Fisher

W. L. Fisher, Chief
Fuel Facility Projects and
Radiation Support Section

cc: L. J. Cunningham