

POOR ORIGINAL

NRC PUBLIC DOCUMENT ROOM

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PRODUCT ASSURANCES CONSULTING



PROJECT NUMBER  
PROPOSED RULE *PR - Misc. Reg. Guide*

POST OFFICE DRAWER 130 - HADDONFIELD, N.J. 08033  
October 22, 1979

Docketing and Service Branch  
Secretary of the Commission  
U.S. Nuclear Regulatory Commission  
WASHINGTON, D.C. 20555

Re: Regulatory Guide 8.21, Rev 1, Oct 1979  
Health Physics Surveys for Byproduct  
Materials at NRC-Licensed Processing  
and Manufacturing Plants.

Gentlemen:

In find the Regulation completely inadequate to describe a good system safety approach to the design, conducting, and evaluation of effectiveness, efficiency, and safety of a health physics program for the "evaluation of the radiation hazards".

1 The term "survey" is used in a manner to extend beyond the normal definition and does not properly relate to other terms used in the Regulation of "audit", "surveillance", "routine survey", "repetitive survey", and reference to other roles of training, inspecting, and similar. If the term is intended to cover "evaluation of the radiation hazards" (Introduction) then it must be expanded to include process design reviews, product design reviews, packaging design reviews, and many other elements necessary for a system safety approach before conducting actual measurements. To measure after the fact provides no assurance of control, especially where statistical sampling is used for evaluation (Para 1.9).

2 Personnel requirements are permitted to be on a single person basis (1.2) but this is countered by reference to "medical consultant" (1.6), "Radiation Safety Officer" (1.5), Radiation Safety Officer (1.16), and "Radiation Safety Staff (1.5).

3 There is need to clarify internal vs external exposures and differences in approaches and controls used relative to exposure potentials.

4 There must be a Section on Definitions to properly explain differences in various terms. For example there is reference in 1.16.1 to "routine radiation and contamination surveys" without explaining how they are defined to assure "such surveillance, one of the most important aspects of a radiation protection program" will be an actual fact. Personally I prefer to start a radiation program at the design stage rather than waiting to make observations of radiological working conditions at a later time during actual operations alone.

To provide all my detailed comments would require a letter of some TEN pages which I believe would not receive proper attention. I therefore propose that when the proper responsible person reads this letter that the undersigned be contacted and at that time the other details will be furnished.

Cordially,

*Harvey E. Schock*  
Harvey Schock

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