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504-4



PROJECT NUMBER
PROPOSED RULE PR - Misc Notice
Reg Guide

September 21, 1979

Secretary of the Commission
U.S. Nuclear Regulatory Commission
WASHINGTON, D.C. 20555

Attention: Docketing and Service Branch

Gentlemen:

Re: Draft Regulatory Guide, Tash OH 804-4
AUDIBLE-ALARM DOSIMETERS

Although I serve as Director of the Institute for Radiation Policy,
I am offering these comments as an individual public citizen:

1. The "need" for the document should be more clearly defined. Presently it covers only industrial radiography and power plant maintenance or repair, while omitting other possible needs, such as inspection and service.
2. The device performance requirements should be more clearly defined in relation to specific needs and not attempt to cover all applications in one set of requirements. For example: 100 hour battery life, self-contained power supply, and mounting details.
3. Although considerable flexibility is permitted in application of Guides, the restrictions on device size appear completely out of place owing to possible wide variations in device mounting and use. For example: devices with clips may not require mounting on cloth.
4. Specific details on the \$77,000 Battelle-Pacific Northwest Laboratories report should be made known and not limited to an indirect reference in Attachment 1, Note #12.
5. In a sense the Guide is an alert to possible serious problems in the field with existing devices. Although the Draft uses the "polite abuse" expression it does not really define the expected level of performance required for such devices as a function of specific need and the possible impact on availability, cost, effectivity, and efficiency for possible applications where such devices are presently completely suitable and essential.

With the proposed limitation in the future for free distribution of Drafts, the undersigned would appreciate receipt of a copy of the final Guide when published.

Cordially,

Harvey Schock

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Acknowledged by card. 9/28