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250 West Water Street Apt. 6 Chillicothe, OH 4560 September 21, 1979

Secretary Of The Commission U.S. Nuclear Regulatory Commission Washington, D. C. 20555

Attention Docketing And Service Branch

Gentlemen:

COMMENTS ON DRAFT REGULATORY GUIDE AND VALUE/IMPACT STATEMENT ON AUDIBLE-ALARM DOSIMETERS

I would like to offer some comments on the draft regulatory guide and value/impact statement on audible-alarm dosimeters (Division 8; TASK OH 804-4).

While I was a student in nuclear engineering at North Carolina State University, I assisted in the development of a neutron radiography unit (NRU) for the NCSU 1 MW + PULSTAR REACTOR (1977 thru early 1979).

In the course of taking neutron radiographs it was necessary to get close to the neutron beam. We had shielded the beam area, however neutrons were scattered out of the opening where the film cassette was placed for exposure. A "chirper" type of audible-alarm was worn as a means of keeping us aware of the radiation field, and would motivate us to move as far away from the beam area as possible while film exposure was taking place (3-5 minutes).

Also while removing the NRU from the reactor beam tube, either for reactivity gains to the reactor or to service/modify the NRU, chirpers were worn. The beam tube was approximately waist high and thus the chirpers were clipped to our belts to warn us if we accidently moved into the beam area (about 7 inches in diameter). One should note that the reactor had been shut down for as long as possible (usually over a weekend) prior to the NRU removal to allow for a reduction in the fissionproduct gammas, however the dose rate in the beam area was still very high (~ 25 R/hr). Thus we could remove the NRU with a minimal radiation exposure. 1743 216

Thank you for allowing me to comment.

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Very truly yours,

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Robert Tayloe, Jr. Nuclear Engineer

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