

LAWRENCE LIVERMORE

Hazards Control Department

May 14, 1979

Dear Overview Committee Member:

The following is a rough summary of the discussions at our first meeting on April 27.

The first meeting of the Personnel Dosimetry Overview Committee was called to order at 9:00 am with Bob Wheeler, Lowell Nichols, Bob Alexander, Don Jones, and George Campbell in attendance.

The first order of business was a review of the Pilot Study by Bob Alexander. The following paragraphs summarize his presentation.

Bob made comments concerning (1) program status, (2) the value of this committee to the NRC, and (3) some alternatives that have been identified for turning the problem around.

(1) Program Status. He is pleased with the way it has been conducted and is not surprised with the results of the tests, though many people (upper management at NRC) are surprised with the results. A report will be made to Congress in September by Mr. Minogue and Bob expects "the world to come briefly to an end." This September deadline may place pressure on the NRC staff to make hasty decisions about the conclusions of the pilot study; that is, it may not allow complete analysis of the results. Minogue will say we have evidence that the errors associated with recorded doses for those years may be much more in error than you think. He will let them know we have a problem with personnel dosimetry. Mr. Minogue will also report epidemiological factors at the same time. Bob Alexander feels inaccuracies do not necessarily mean people are working in unsafe conditions.

The members of the Policy Committee are:

Robert Alexander - NRC
Jim Leiss - NBS (recently replaced by Elmer Eisenhower)
Ed Vallaric - DOE
Vandy Miller - Department of Defense
Joe Gitten - Bureau of Radiological Health
Larry Lloyd - Representative of States,
Louis Garcia - EPA
David Lee - OSHA

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Everyone on the Policy Committee feels we do not have a good handle on the poor performance. It may be lack of standardization rather than poor performance. Standardization may become the key word (even though it may do more harm than good) just so it can be regulated. Causes...feels we don't really need to know the causes or the differences. Phil Plato thinks it is differences in calibration techniques.

Bob Alexander wants to send Plato and Hudson out to do a sampling of the 58 processors. They have til the end of May. However, they are only visiting eight of the largest processors (Alexander thinks they're all commercial). Whatever their findings are from these eight processors, they will assume it will be representative of the others.

Bob would like to have a committee visit all 58 processors to determine causes of these failures. The Overview Committee should prepare a letter to the NRC to bring pressure to let the above be carried out. Help from the Overview Committee might allow NRC staff/management to come to a compromise. Bob feels the problems that may exist in the personnel dosimetry industry are of long standing and we must solve them before Minogue speaks to Congress on the matter.

He finds much determination among federal groups to do something about the dosimetry problem. He thinks we will get some action this time. The Policy Committee will issue a "Notice of Intent" into the Federal Register. This Notice of Intent says "we intend to make a recommendation, what comments would you like to make on it before it is published."

(2) Value of the Personnel Dosimetry Overview Committee

- Need for early industry input into NRC's regulatory activities - whether it is a regulatory rule changing, report, etc. NRC doesn't receive input until after they publish the draft; then they are reluctant to make changes. There is a need to factor "real world" into these early decisions.
- The NRC can have all the advantages of an advisory committee without the costs. This is what they will be looking to this committee for.
- Bob proposed five functions for the committee in addition to those proposed by George Campbell:
 - a. Suggestions on overall plan
 - b. After plan has been put into effect, provide an invaluable source of feedback from industry.
 - c. Evaluation of the standard
 - d. Review of NRC's proposed rules, not only what to say but how it is said. They would send out drafts of proposed rules before they are published in the Federal Register.
 - e. Advice in general.

(3) Alternative Solutions (brainstorming)

We probably haven't thought of all the alternatives dealt with in Commission Papers.

- Have a national personnel dosimetry service formed by the government (either mandatory or optional). (The NRPB provides that for UK but most people still do their own.) (However, when it gets into the government, it is very difficult to maintain quality assurance.)
- Federal government certification program. Enact a national law that would say people offering personnel dosimetry services would have to be certified by the government. (Could have test labs operated by the government.)
- NRC would propose legislation for its licensees and the states and others would come in "piggy back." Then the NRC would set up a testing lab. DOE could request all their people to comply.

Alternatives

- NRC could operate test lab
- NRC could contract the test lab (funded by NRC as a free service, or it could be self-supporting).
- NIOSH, or other federal agency which is more equipped to operate a lab, would operate the test lab.
- We will only accept data from processors who have passed these tests every year. Let them figure out how they're going to set up the lab - just give them a certain time to have it done.

After Bob concluded these comments, he distributed copies of his draft "Statement of the Problems" which was mailed to you last week.

Other Comments During the Day

G. Campbell: Should we have more than one test lab - perhaps one on the east coast and one on the west coast? It would allow one lab to be intercompared against the other.

B. Wheeler: Suggest one of them be an NBS standard. If we are not a federal committee, how do we put "teeth" into an appeals situation?

B. Alexander: The appeals procedure would have to be a part of the regulation - the Commission would have to decide that.

G. Campbell: Wade Patterson suggested we set it up as an independent committee and perhaps at some later point, the Health Physics Society might take it under their wing if they decided it fell within their purview. (However, the appeals procedure doesn't seem to fit into the standards of the Health Physics Society.)

L. Nichols: The committee wouldn't have much "clout."

B. Alexander: Regulation could provide for that. Would prefer federal government certification (would prefer NIOSH) body to certify and decertify.

Eric Geiger (via George Campbell): Make it DOE funded and DOE approved. (There was little enthusiasm for this idea.)

B. Wheeler: Let processors bear the cost of the testing lab. (Nichols objected).

Committee Functions

We agreed to the five functions proposed by Bob Alexander. In addition, we also added the following functions:

- Review and provide advice in general on the day to day operations and quality assurance program for the testing lab.
- Review an internal audit program for the testing lab.

Bob Alexander advised that Plato is supposed to be writing an operations manual which would be published and used by whatever lab is set up. Perhaps an internal audit should be a part of that manual. (Our committee is not really far enough along to design such a plan in the time frame that Plato is writing the manual. (GWC))

- Evaluate the final testing program proposed at the conclusion of the Pilot Program.
- Provide practical technical assistance to the testing lab.

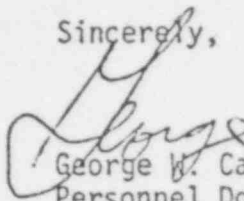
There was considerable discussion on the proposed function of establishing an appeals procedure. Lowell Nichols wanted to know the legal implications of this function. We all felt it was partially a function of how the committee is established. George Campbell will contact the Health Physics Society and the Policy Committee to obtain their opinion of the Overview Committee and how it should be established. Bob Alexander and George Campbell favored an independent group...and there was general agreement if we can put some teeth in it. Many people don't put much trust in a committee that is government funded. We all agreed to check with our own legal counsel on this matter.

I would like to have our next committee meeting at the Health Physics Meeting in Philadelphia on Monday, Tuesday, or Thursday evening. Please let me know if you can make it and give me your choice of meeting days and times.

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I have written a rough draft of the memo that Bob Alexander suggested we write to Mr. Minogue. Please forward your comments to me within two weeks.


Sincerely,



George W. Campbell, Chairman
Personnel Dosimetry Testing
Laboratory Overview Committee

GWC:ah

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cc: Mr. Robert Alexander 
Dr. Margarete Ehrlich

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