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Gamma Station
August 10, 1977
Docket #PRM-20-9

Secretary of the Commission
Docketing & Service Branch
U. S. NUCLEAR REGULATORY COMMISSION
Washington, D. C. 20555

Dear Sir:

I contend that the proposed amendment does not improve the quality of a survey nor does it provide better control of external dose rates.

The level of 5 centimeters (2") from a package surface is approximately the distance of the axis of any detector used to measure dose rate around a carton. Thus, any surface measurements are actually made at this distance and the reduced dose rate limit would pose a hardship on shippers by increasing the shielding requirements or increasing the size of the packages required.

Also, the area allowed for averaging is not as large as the normal probe area. Dose rate is normally measured by a cutie pie with a chamber approximately 6" long by 3" in diameter which exceeds the minimum dimension of 5 cm and the minimum area covered by the chamber is approximately 100 cm². If a GM probe is used, normal dimensions are 5" long X 1" in diameter or approximately 32 cm².

The International Organization for Standardization, Shielding Efficiency Test for Gamma Radiography Apparatus indicates that "at or 50 mm from the surface" are the same. Also, the standard proposes using film for measuring radiation levels which can be used within the small area of 10 cm².

I repeat, these proposed changes would be more impractical than the existing regulation for measuring dose rates around packages.

Very truly yours,

79051500619

E. L. DeMeritt

E. L. DeMeritt, Supervisor
Chemistry and Health Physics

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