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STATE OF DELAWARE  
DEPARTMENT OF HEALTH AND SOCIAL SERVICES  
DIVISION OF RADIATION CONTROL  
1000 MARKET STREET  
DOVER, DELAWARE 19901  
May 20, 1980

22-20 (21)  
(45 FR 20493)



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

ATTENTION: Docketing and Service Branch

Dear Sir:

The Delaware Office of Radiation Safety has noted occasionally a considerable variation, in one instance, an orders of magnitude difference, in the radiation doses reported for different people in the same institution during the same time period being reported by commercial personnel dosimetry suppliers. We do not know, whether these are actual variations in the radiation dose received or simply aberrations in the reliability of the results. This causes some doubt on the results reported by all suppliers of these services.

The University of Michigan's pilot study has clearly demonstrated that assurance of reliability can be given. We support this effort so that the occupationally exposed persons may have some confidence in, the range of the doses, and the doses that are reported to them. We commend the NRC in their actions to have an NRC certified laboratory with continual monitoring by the National Bureau of Standards.

We are glad to see that the position advanced by The Personnel Dosimetry Task Force chaired by Mr. Larry L. Lloyd (of Montana) of the Conference of Radiation Control Program Directors, Inc. for the past five (5) years in addressing this problem and suggesting a plan of action is coming about. Therefore, the results of personnel radiation monitoring will be reported, in the near future, with some assurance that the results are reliable.

Thank you for this opportunity to comment on the advance notice of rulemaking.

Sincerely,  
*Edwin Lee Stein*  
Edwin Lee Stein, Program Director  
Office of Radiation Safety

L-4-11-80

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