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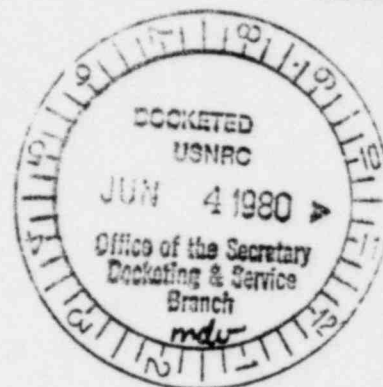
DOCKET NUMBER  
PROPOSED RULE **PR-20 (22)**  
**(45 FR 20493)**



**Robert V. Wheeler**  
Assistant General Manager  
May 30, 1980

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

Attention: Docketing and Services Branch



Gentlemen:

We wish to offer the following comment on the "Advance Notice of Rulemaking for Certification of Personnel Dosimetry Processors" (45 CFR, Part 20) in addition to those submitted during the last few weeks.

The question of financial support for the certification laboratory has been discussed previously. Our position firmly supports the position that this laboratory be financially self-supporting and that as a possible alternative it be operated under contract to such existing government agencies as NIOSH or the National Bureau of Standards. The fees for certification paid by a processor should be proportional to the effort extended by the certification laboratory in determining the competence of the processor; in other words the effort extended in the testing procedure.

For example, if two processors were tested in four identical categories the fees charged those two processors should be equal and not related to the number of participant badges normally serviced by the processor. We believe this procedure is more critical and it is the only procedure consistent with the Robinson-Patman Act.

Sincerely,

R. S. LANDAUER, JR. & CO.  
DIV. OF TECHNICAL OPERATIONS, INC.

*[Signature]*  
Robert V. Wheeler  
Assistant General Manager

RVW:ml

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Acknowledged by card. 6/4/80... mdu...