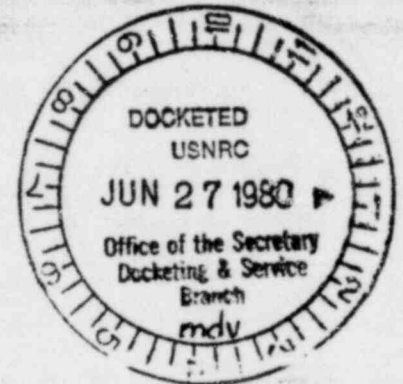




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PROPOSED RULE (45 FR 20493)



June 26, 1980

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

Dear Sir:

The following comments on the commission's March 28 advance notice of rulemaking on certification of personnel dosimetry processors are offered on behalf of the 15,000 members of the American College of Radiology. Our members are physician and physicist specialists in the uses of ionizing radiation for the diagnosis and treatment of disease.

The ACR has a firm position of support for quality assurance activities in the several areas of radiology. We encourage improvements in dosimetry manufacturing and processing methods, but we urge the commission to weigh carefully the cost-benefit equation of added certification regulation. We are concerned that overburdensome regulation of the commercial dosimetry processors will increase their costs. Processors may find that it is uneconomical to perform their services for NRC licensees and for other medical radiation users. This would disrupt vital radiological health care for millions of Americans.

The notice suggests that certification of processors by a testing laboratory may improve the dosimetry processors' accuracy. We caution that certification does not guarantee improvement. However, if the commission determines that certification is necessary, we urge that testing laboratories be established by the processors not under contract or control of the NRC or any other federal agency.

Sincerely,

Otha W. Linton

Otha W. Linton
Director of Governmental Relations

OWL/bjn

Acknowledged by card. 6/27/80. mdv

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