

POOR ORIGINAL

OH 905-4
A. Roeklein

WRD-LA-036

8005150338

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DOCKET NUMBER

PROPOSED RULE

PR - Misc. Notice
Reg. Guide

January 10, 1980

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

Attention: Docketing and Service Branch

Gentlemen:

Subject: Task OH-905-4, "Calibration and Error Limits of Air
Sampling Instruments for Total Volume of Air Sampled"



The Westinghouse Electric Corporation, a manufacturer of nuclear fuel assemblies, has reviewed the subject draft regulatory guide and offers the following comments thereon.

In Section C.2. "Error Limit for Measurement of Air Sample Volume," it states that primary standards for calibrating air flow should be accurate to within 1% and secondary standards to within 2%. These accuracy levels seem to be unduly restrictive. It is not clear why such accuracy is needed, especially with the uncertainty as to the requirements for worker exposure given in 10CFR20's Maximum Permissible Concentrations to just one significant figure. Furthermore, air sampling is only one part of a licensee's total safety program.

There are other aspects of dose rate which introduce errors that are more important than the error in the volume of air sampled. If these other sources are not carefully looked at, it is probable that one will be spending substantial costs and efforts to control a minor portion of the total error.

Additionally, one should not expect personnel (lanel) samplers that have flow rate meters to be calibrated to within 10%, since these are small devices which are difficult to read, have relatively large fluctuations, and are prone to impact-induced mechanical malfunctions.

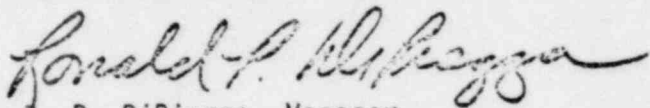
Regarding the value/impact statement, using the number of man-hours per year per instrument as an indication of industry impact could mislead the public and others in the effort expended on controlling airborne radioactive contaminants. For a model facility, say, with 150 fixed air samplers, 100 personnel samplers, the total requirements would be 300 to

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600 man-hours per year using one to two man-hours per year per instrument. This is about one quarter man-year for this minor portion of a facility's total safety program.

Yours truly,

WESTINGHOUSE ELECTRIC CORPORATION

A handwritten signature in cursive script, appearing to read "R. P. DiPiazza".

R. P. DiPiazza, Manager
NES Licensing & Administration