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FROM: Nancy Deris
Occupational Health Stds. Br. (35970)

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NUREG Report _____
Contract No. _____

Subject: Letter dated April 25,
1980 to Dr. Delta
Chulich.

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Dr. Greta Ehrlich
U.S. Department of Commerce
National Bureau of Standards
Washington, D. C. 20234

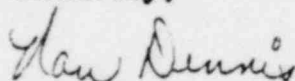
Dear Dr. Ehrlich:

As you are aware, the NRC has recently published for comment an advance notice of rulemaking on the subject of certification of personnel dosimetry processors. The advance notice clearly states the Government's commitment to introduce regulatory changes to 10 CFR Part 20 intended to improve the accuracy and consistency of dosimetry data used in making occupational dose assessments. The advance notice suggests the possibility that the proposed rule will require that dose estimates will only be acceptable to the NRC if performed by certified dosimetry processors. The revised Health Physics Society Standards Committee (HPSSC) standard will be recommended to the Commission, possibly in modified form, as the basis for the certification program.

An item of major concern to the NRC staff is the adoption of conversion factors which relate low-energy photon exposure (R) to dose equivalent index (rem). The conversion factors (C_x values) were recently measured at Battelle Pacific Northwest Laboratories and reported in NUREG/CR-1057. As you are aware, significant differences exist between the C_x values modelled and accepted by your revised HPSSC standard working group and those measured at Battelle, particularly the 16, 78, and 100 keV k-fluorescence measurements.

The values chosen will influence the magnitude of assigned occupational dose equivalents for some workers and thus could have considerable impact. In the near future the staff will recommend to the Commission proposed amendments to 10 CFR Part 20; in the development of the proposed amendments we will have to make a decision as to whether to recommend the C_x values in the revised standard or the values determined at Battelle. In making this decision we would like to take full advantage of your views as to why the values from the standard should be used, rather than those measured at Battelle. Since you recently agreed to provide a justification of this nature, we are requesting it at this time.

Sincerely,



Nancy Dennis
Occupational Health Standards Branch
Office of Standards Development