



Texas Department of Health

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DOCKET NUMBER
PROPOSED RULE

PR Misc Notice
Reg Guide

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

Attn: Docketing and Service Branch

Dear Sirs:

Members of the Radiation Control Branch of the Texas Department of Health have reviewed the "Proposed Revision 2 to Regulatory Guide 8.14, Personnel Neutron Dosimeters" and have the following comments:

1. On page 9 of the document in the Draft Value/Impact Statement you indicate that NTA film badges should not be used by power reactor licensees for neutron dosimetry. It should be noted that for the conditions stated, the NTA film badge is probably inappropriate for persons involved in well logging operations.
2. On page 2 of the document, you state that Albedo neutron dosimeters are generally believed to be more sensitive than required. This statement is true only if the Albedo dosimeter is worn correctly.
3. The use of the neutron/gamma ratio generally would not be acceptable for well loggers who use gamma sources in addition to neutron/gamma sources.
4. Some clarification of the intent of the Regulatory Guide concerning its being primarily directed to power reactor licensees needs to be made.

Thank you for the opportunity to comment on this proposed revision.

Sincerely,

David K. Lacker

David K. Lacker, Director
Division of Occupational Health
and Radiation Control



ACK by card
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