



Commonwealth Edison
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P4 20
 [45 FR 20493]
 5/27/80

April 16, 1980

DOCKET NUMBER
 PROPOSED RULE **PR-20 (2)**
(45 FR 20493)



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

Attention: Docketing and Service Branch

Subject: Advanced notice of rulemaking to improve accuracy
 in personnel dosimetry.

Dear Sir:

Commonwealth Edison has reviewed the subject notice
 and offers the attached comments.

We appreciate having been given the opportunity to
 comment.

D. L. Peoples

D. L. Peoples
 Director of Nuclear
 Licensing

attachment

to
 5/1/80

L-4-1, PR-20

8005230327

COMMENTS - Advanced notice of rulemaking to improve accuracy in personnel dosimetry.

A. General

1. Certification of the dosimetry processor is desirable.
2. NBS monitoring of private testing labs is preferred to the other options listed.
 - a. NRC or other federal government contracted or operated labs would have the same potential for quality assurance and quality control problems as a private laboratory and thus, would not necessarily offer a superior service.
3. Additional research is needed in the personnel dosimetry area. A dosimeter which exhibits a relatively flat response to radiation energies of 0.08 MEV to 7.0 MEV needs to be developed.
4. An ANSI Standard or Regulatory Guide should be written which recommends acceptable radiation sources for various types of licensees. For example, Cesium-137 might be recommended for power reactors. This isotope would then be used by the tester and the processor for certification purposes and by the licensee for calibration of portable survey instruments.

B. Problems Associated with a Loss of Processor Certification

1. Potential problem areas that may arise when a processor loses his certification follow:
 - a. The licensee may have a long term contract with the processor and thus, will be unable to modify his specification until the end of the contract period. This will be an important consideration for those contracts which exist when the rulemaking becomes effective.
 - b. Some licensees process 75,000 or more dosimeters each year. If this service is contracted, several months will be required to interface the licensee's computer system to the new processor's computer. This interface is normally not direct and may require new equipment or modifications to existing equipment.
 - c. Only a few processors in the U.S. can handle a large dosimetry contract on short notice.

- d. A short turn around time for special processing of personnel dosimeters which have received significant exposures is desirable and it is important that the processor's facility is located near the licensee in order to facilitate this service. This option further restricts the number of contract services that are available in any geographical area to handle a large contract on short notice.
- e. Legal problems may arise which question the validity of recorded exposures.