

DEPARTMENT OF SOCIAL SERVICES



ELLIS FISCHER STATE CANCER HOSPITAL

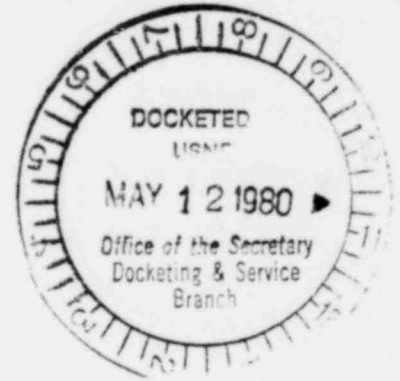
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DOCKET NUMBER PR-20 (9)
PROPOSED RULE (45 FR 20493)



Secretary of the Commission
Attention: Docketing and Service Branch
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Re: Federal Register Volume 45, No. 62
Friday, March 28, 1980
Proposed Rules, pages 20493-20496

Gentlemen,

Let me commend you for the excellent work you have done thus far on the problem of regulation of personnel dosimetry processors. Identifying the four major causes of poor performance of such processors is a giant step towards the eradication of variable and nonreliable processor information. Considering the near hysteria fear that predominates in many circles of the public when the word radiation exposure is mentioned, the need for accurate and consistent monitoring of occupationally exposed personnel is selfevident.

I would like to comment on the future actions, especially regarding processor certification as mentioned on 20495 of the above named Federal Register. I would favor alternative 2 or: i.e., NRC-Operated Laboratory or NRC-Contracted Laboratory as effective solutions to the problem of processor monitoring. The NRC regulations which relate to personnel exposure are best known to federal personnel involved in the radiation field, and it is logical that in the inception of the corrective program, processing should be done by an NRC related or contracted laboratory. Once a consistently effective program of dosimetry monitoring had been established, then considerations of allowing unspecified laboratories to resume monitoring could be reconsidered. Additionally, the use of NRC related laboratories would facilitate and expedite reporting possible overexposures to personnel to the appropriate agencies.

I hope you have found these comments to your interest, and I remain,

Cordially yours,

L. L. Doss, M. D.

Radiation Safety Officer and
Acting Director of Radiation Therapy

Acknowledged by card. 5/14/80... mdu...

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