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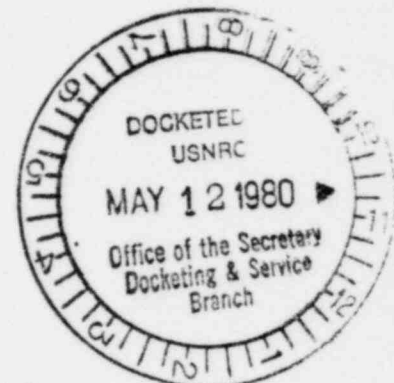
Robert V. Wheeler
Assistant General Manager
May 8, 1980

DOCKET NUMBER
PROPOSED RULE **PR-20** (10)
(45 FR 20493)

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

Attention: Docketing and Service Branch

Gentlemen:



With reference to 10 CFR, Part 20, "Advance Notice of Rulemaking on Certification of Personnel Dosimetry Processors", we wish to confirm our full support for the timely and prompt implementation of this regulatory action. We do wish, however to add two areas of comment.

First, it is implied that the NRC has the option to actively modify, for the purpose of the rule, details of ANSI Standard N13.11. While we cannot comment on the commission's option to make such modifications, we would strongly recommend caution in any changes which might bias the results obtained during the two test periods of the proposed standard conducted at the University of Michigan.

Secondly, while a number of alternative arrangements for the certification lab are workable we would like to suggest an independent lab under contract to the National Bureau of Standards as a viable working relationship considering that the NBS is also the most likely organization to oversee the technical competence of that laboratory.

Sincerely,

R. S. LANDAUER, JR. & CO.
DIV. OF TECHNICAL OPERATIONS, INC.

Robert V. Wheeler
Robert V. Wheeler
Assistant General Manager

RVW/ml

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