



OH 940-4

Department of Energy
Clinch River Breeder Reactor
Plant Project Office
P.O. Box U
Oak Ridge, Tennessee 37830

May 23, 1980



DOCKET NUMBER
PROPOSED RULE PR-Misc. Notice
Reg Guide

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

ATTN: Docketing and Service Branch

Dear Sir:

COMMENTS ON DRAFT REGULATORY GUIDE 8.14, TASK OH 940-4

We have reviewed Proposed Revision 2 of the subject Reg. Guide, "Personnel Neutron Dosimeters," and its accompanying Value/Impact Statement. Our comments are enclosed. If you have any questions concerning these comments, please contact Wendall W. Ogg (FTS 626-6363) of my staff.

Sincerely,

Raymond L. Copeland
Raymond L. Copeland
Acting Assistant Director
for Public Safety

PS:80:156

Enclosure

Acknowledged by card 5/30/80. mdv

8006090125

COMMENTS ON PROPOSED REVISION 2 TO REGULATORY GUIDE 8.14

"PERSONNEL NEUTRON DOSIMETERS"

General Comments

It is agreed that, due to the facts brought out, there is justification for this Regulatory Guide revision. The need for improved accuracy is important and should be near that of dosimetry for gamma. This is from standpoints of health and professional aptitude as well as equity to the utility.

Specific Comments

1. Albedo Neutron Dosimeters

Apparently, these dosimeters are already commercially available. Also, both Lawrence Livermore Laboratory and Oak Ridge National Laboratory use albedo dosimeters of their own design and manufacture routinely. The dosimeter at LLL is completely encased in cadmium and thereby may have less orientation restrictions.

2. Rem Meters and Neutron/Gamma Ratios

It is agreed that the $\pm 50\%$ constancy factor for neutron/gamma ratio is acceptable. The modified A-B rem meter may be superior in that in-leakage radiation was reduced. Perhaps a clause should be written in the guide concerning the need for absolute quality of the rem instruments, attained by more frequent calibration or by modification, such as when cable in-leakage is found to exist.

3. Value/Impact Statement

There are no comments on the Value/Impact Statement.