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

Attention: Docketing and Service Branch

Dear Sir:



The Louisiana Nuclear Energy Division has long been dissatisfied with the apparent lack of reliability in the radiation doses being reported by commercial and private personnel dosimetry suppliers. Considerable variation in results being reported has been noted on more than one occasion, thereby casting doubt on the results reported by all suppliers of such services.

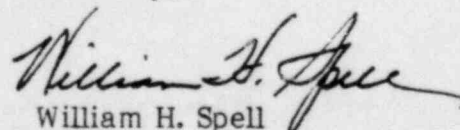
The pilot study conducted by the University of Michigan has clearly demonstrated that assurance of reliability can be given. Therefore, it is up to regulatory agencies, both state and Federal, to lend support to this effort in order that those persons occupationally exposed may have some degree of confidence in the range, at least, of the doses which have been reported to them. We commend and support the NRC in the action being taken.

Furthermore, it is gratifying to see that the position advocated by a task force of the Conference of Radiation Control Program Directors, Inc. several years ago in addressing this problem and suggesting a plan of action is being brought to a successful conclusion, namely, that the results of personnel monitoring will be reported, in the foreseeable future, with some assurance that those results are reliable.

We support the concept of having an NRC certified laboratory with continual monitoring by the National Bureau of Standards.

Thank you for the opportunity to comment on the advance notice of rulemaking.

Sincerely,


William H. Spell
Administrator
Nuclear Energy Division

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cc: National Bureau of Standards

Acknowledged by card. 5/20/80...mdw... L-4-1PT20