

BECKMAN

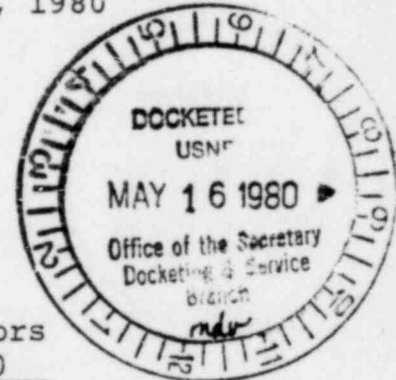
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OFFICE OF
VICE PRESIDENT-LEGAL

May 15, 1980

DOCKET NUMBER PR-20 (12)
PROPOSED RULE (45 FR 20493)

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



Attn: Docketing and Service Branch

Re: Certification of Personnel Dosimetry Processors
Advance Notice of Rulemaking - March 28, 1980

Gentlemen:

Based on the history of the dosimeter processing problem and the improvement achieved with the one processor NRC worked with, we agree that corrective measures of some kind are needed and support this NRC proposal within reasonable cost limits. We believe that some additional cost is justified to improve the quality of the dosimeter results, but should the cost become excessive, other means of personnel exposure measurement should be considered.

The proposed rulemaking does not expressly address the in-house processing of dosimeters. While we do not at this time perform our own dosimeter processing, we are considering this alternative for the future. Additionally, we are informed that many large firms already perform their own dosimeter processing. Therefore, the rule ultimately promulgated should specifically provide for this mode of processing.

For example, the following questions should be answered: 1) Is it intended that the proposed rulemaking apply to in-house dosimeter processing? 2) Must the in-house process be certified? 3) What are the criteria for in-house certification? Are they the same as for outside processors? Should they be the same?

Very truly yours,
William W. Davis
William W. Davis
Associate Counsel
Regulatory Affairs

WWD/db

Acknowledged by card. 5/21/80. mdv.....

Certified Mail - RRR

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