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PROPOSED RULE **PR-20 (37)**
(45 FR 20493)

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

Attention: Docketing & Service Branch

Subject: Advance Notice of Rulemaking on Certification
of Personnel Dosimetry Processors

Reference: Federal Register Notice, Volume 45, No. 62
Friday, March 28, 1980, Pg. 20493,-94,-95,-96



Dear Sir:

The following are our comments on the subject advance notice of rulemaking above.

We do not believe enough evidence was presented at the recent public meeting that would require or justify a mandatory personnel dosimetry testing program. Therefore, we ask the NRC to consider delaying implementation of such a program at least until some of the technical problems discussed at the meeting (e.g., changes in C_x values and recommendations of measuring the average dose to the live skin rather than the surface dose) are fully resolved.

At this time, we prefer to have a voluntary program. This was tried to some extent in the past (the NSF program) and apparently did not work; however, the time is now right for a voluntary program. We believe that a voluntary program would be very successful now because a greater emphasis is being placed on radiation exposure records and personnel dosimetry programs, particularly since more companies are maintaining in-house dosimetry programs. A voluntary testing program would become an integral part of the quality assurance program and could be used to further document the adequacy of the personnel dosimetry program. The credibility of a company would be even more enhanced if they participated in the testing program voluntarily.

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If a mandatory testing program is adopted, we would like to see a "grace" period of three years during which time a processor would not be penalized for not passing the performance criteria. This period would be used by the NRC to check improvements (if any) in the performance of individual processors as well as that of the entire industry and to measure the impact of the program on the entire industry. We think that an accurate assessment of its impact can be made after three years of experience. If the program does not prove to be useful, the program could then be discontinued without any severe penalties to processors.

We recommend that the recently revised HPSSC/ANSI Standard (ANSI N13.11) be used for the test and that the testing facility be a private laboratory under contract to the NRC having equipment and sources traceable to the National Bureau of Standards. The testing fee should be prorated to the number of badges processed by a company but should include minimum and maximum fees. This should help the smaller processors without excessively penalizing the large facilities.

We hope the NRC will give serious consideration to our recommendation of a voluntary program. We believe this is the best alternative.

Sincerely yours,



Lionel Lewis
System Health Physicist

MAJ:scd