

OH-506-1

(Docket)



RADIATION DETECTION COMPANY

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April 25, 1980

DOCKET NUMBER **PR-20** **32**
PROPOSED RULE
(45 FR 20493)



Dr. Phillip Plato
The University of Michigan
School of Public Health
Dept. of Environmental and Industrial Health
Ann Arbor, MI 48109

Dear Dr. Flato:

Radiation Detection Company (RDC) will be unable to attend the meeting of Commercial Processors on April 29, 1980. We are therefore submitting our views to you in this letter.

RDC supports the idea of a mandatory dosimetry testing program. The only technical comment is that we recommend two neutron tests: 1) The Cf-252 source test that you recommend and 2) A test at about 4.5 meV using a Pu-Be source. You used to test neutrons in the past with a Pu-Be source and we recommend that you reinstate that test along with the present Cf-252 source test.

With regard to commercial matters, RDC has the following comments:

1. I-C-1-c Advertising potential - We feel that the purpose of the testing program is to improve the industry as a whole. We therefore recommend that the same attitude that has existed since the inception of the NSF testing program be continued; namely that each processor agree not to take advantage of whatever "advertising potential" they have from year to year.
2. I-C-2-a Financial cost - RDC naturally feels that the financial cost should be kept as low as possible without jeopardizing the validity of the program.
3. II Technical alternatives - We have no objections to either A or C.
4. III-A Frequency of testing - We agree with the frequency recommended in NURGG/CR-1064.
5. III-B Type and number of testing laboratories - We prefer either 4 or 5. We feel that five may not be practical due to the size of the industry; therefore we would prefer to have NSF serve as the private laboratory under contract to the NRC.

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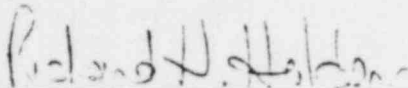
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SERVICE IS OUR PRODUCT

6. III-C Technical supervision of the testing laboratory - We prefer #1 "monitored by NBS"; we would require additional details of #3 prior to giving an opinion; and we strongly oppose #2 because it is a conflict of interest situation.
7. III-D Appeals procedures - We prefer #3 "appeal to an HPSSC/ANSI standards committee; we would require additional details on #2 prior to giving an opinion; and we strongly oppose #1 because it is a conflict of interest situation.

Very truly yours,



Richard H. Holden
President

RHH/sta

AGENDUM OF MEETING TO DISCUSS A MANDATORY
PERSONAL DOSIMETRY TESTING PROGRAM

Ann Arbor, Michigan

I. Proposed Action

A. Description: All processors of personal dosimeters in the United States shall be required to have their performance tested on a regular basis.

B. Need

1. Results of the two-year pilot study of the HPSSC/ANSI Standard (ANSI N13.11).
2. Uses and abuses of epidemiological studies.
3. Some workers are being exposed to types of radiation for which their dosimeters are not sensitive.
4. Experience with the National Sanitation Foundation shows that a voluntary testing program is not successful due to a lack of participation by the majority of processors.
5. Need for uniform procedures for calibrating dosimeters and reporting of doses.

C. Values and Impacts of the Proposed Action

1. Value

- a. Improvement in the accuracy of personal monitoring.
- b. Improvement in quality control procedures of processors.
- c. Advertising potential for commercial processors that perform satisfactorily.
- d. Uniform procedures for calibrating dosimeters and reporting doses.

2. Impact

- a. Financial cost
 - (1) Testing fee
 - (2) Time requirements of processor personnel

(3) Loss of business for commercial processors that perform poorly.

b. Increase or decrease in reported doses due to changes in calibration procedures.

c. Shift of users from a processor (commercial or in-house) that performs poorly to a processor that performs satisfactorily.

D. Recommendation on the proposed action

1. Accept a mandatory testing program

2. Accept a voluntary testing program

3. Reject any testing program

II. Technical Alternatives

A. Advantages and disadvantages of using ANSI N13.11.

B. Advantages and disadvantages of using an ISO standard.

C. Advantages and disadvantages of using the National Sanitation Foundation's standard.

D. Use of other standards.

E. Recommendation on which Standard to use.

III. Procedural Alternatives

A. Frequency of testing

B. Type and number of testing laboratories

1. Laboratory operated by the NRC

2. Laboratory operated by a National Laboratory

3. Laboratory operated by another Government agency

a. NBS

b. OSHA

c. EPA

4. Private laboratory under contract to the NRC

5. Several laboratories as determined by free-market competition
- C. Technical supervision of the testing laboratory
1. Monitored by NBS
 2. Monitored by a peer-review committee
 3. Monitored by a Certification and Review Board
- D. Appeals procedures
1. Appeal to a peer-review committee
 2. Appeal to a Certification and Review Board
 3. Appeal to an HPSSC/ANSI standards committee