

(45 FR 20493)

## CONFERENCE OF RADIATION CONTROL PROGRAM DIRECTORS, INC.



P.O. Box 231 Portland, OR 97207

July 3, 1980

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

Attn: Docketing and Service Branch

Gentlemen:



SUBJECT: March 28, 1980 Advanced Notice of  
Rule Making - Personnel Dosimetry

Inaccurate dose assessments due to poor performance by suppliers of personnel dosimetry services has been a major concern of the Conference of Radiation Control Program Directors, Inc. (CRCPD). Because of this concern, CRCPD held a workshop at its 1973 annual meeting in Portland, Oregon, to assess the magnitude of the problem and to discuss actions which could lead to the development of a reliability assurance program for suppliers of personnel dosimetry services.

Since 1973, CRCPD has sponsored a Task Force on Personnel Dosimetry to initiate the coordination of federal agencies for the purpose of developing a personnel dosimetry testing and certification program and to keep CRCPD apprised of progress toward this goal.

The experience of the National Sanitation Foundation (NSF) during the mid 1960's has shown that only a mandatory personnel dosimetry testing and certification program will meet health physics needs. The NSF program of voluntary testing and certification received little support or participation by suppliers of personnel dosimetry services.

The pilot study recently completed by the University of Michigan has demonstrated that many suppliers of personnel dosimetry services are continuing to supply dose assessments of questionable value. This pilot study has also shown that the state-of-the-art of personnel dosimetry is such that suppliers can provide dose assessments within desired limits of precision and accuracy.

State and federal regulatory agencies must take action to assure that occupationally exposed individuals can have confidence in the doses that are reported to them.

Administrated by end: 7-11-80 weh

L-4-1, Pt. 20

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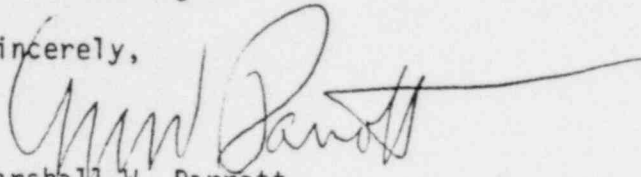
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The CRCPD is pleased that the personnel dosimetry testing and certification program which it envisioned in 1973 is approaching reality through the efforts of the NRC and other participating federal agencies.

The CRCPD strongly supports the concept of the NRC requiring licensees to use a tested and certified personnel dosimetry service and that the testing laboratory be continually monitored by the National Bureau of Standards.

The CRCPD appreciates the opportunity to comment on the advance notice of rulemaking.

Sincerely,

A handwritten signature in cursive script, appearing to read "Marshall W. Parrott", with a long horizontal flourish extending to the right.

Marshall W. Parrott  
Chairman  
Conference of Radiation Control Program Directors