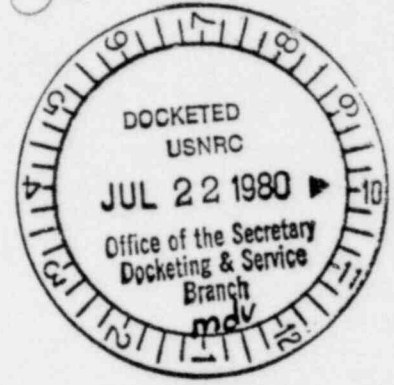


HEALTH PHYSICS SYSTEMS, INC.

A Subsidiary of Quadrex Corporation

OS TP 602-4

July 11, 1980 DOCKET NUMBER PR-Misc Notice
PROPOSED RULE Reg Guide



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

Attn: Docketing and
Service Branch

RE: Comments on Regulatory Guide 10.6
"Guide for the Preparation of
Applications for Use of Sealed
Sources and Devices for Performing
Industrial Radiography"

Dear Sirs:

1. The acceptable level of 2 mr/hr at 18 inches (pg. 5, line 2 and pg. 18, line 13) is questionable. Throughout the regulatory guides set forth in CFR 10 and CFR 49, various radiation levels are either required and/or recommended. I find no objections at this time with the acceptable radiation levels but I do find the inconsistency in distances (i.e. surface, 3 feet, 6 feet and now 18 inches) discomfoting. I recommend that this 2 mr/hr level be maintained at 3 feet or to be in agreement with the current trend 1 meter.
2. With regards to the proper calibrations of survey instrumentation (pg. 5, item 6(c) and specifically line 23, I feel that the stated requirements are not consistent with the overall goal of the guideline. A major dependence is placed on proper determination of specific boundaries and potential personnel hazards due to exposure. However, this guideline permits some applicants to omit their qualifications for performing such calibration. The most significantly useful tool to determine these levels is the survey meter.
3. The description of suggested personnel dosimetry (pg. 6, item 6(d) is not consistent with the rest of the guideline. I fully agree that dosimeters with ranges of 0-100R are not acceptable as the primary pocket dosimeter due to the inability to adequately determine the more probable lower dosages. On the other hand, I feel that the guideline implies that the 0-200 mr dosimeter is recommended. If you refer to pg. 30, paragraph 1, you will find some data which are not in agreement with this implication. I recommend that for those radiographers who utilize high levels of radiation, the standard dosimeter be either 0-1R or 0-5R with a possible back-up dosimeter of 0-100R. This would allow for relatively accurate day to day determinations of low exposures and also permit more data to the Health Physicist should an overexposure occur.

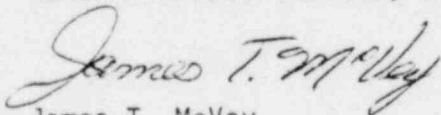
mdv

Acknowledged by card 7/22/80. mdv..

Letter to:
Secretary of the Commission
U.S. Nuclear Regulatory Commission
July 11, 1980
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4. The statement on pg. 12, Appendix A, (e), is confusing and not acceptable. The attempted statement is that no survey instrumentation should produce readings which vary more than $\pm 20\%$ of the expected value. Even the 20% is too high and $\pm 10\%$ is obtainable and more appropriate.

Respectfully,
HEALTH PHYSICS SYSTEMS, INC.



James T. McVey
Health Physicist

JTM/baa