



*Dennis*

**UNITED STATES DEPARTMENT OF COMMERCE**  
 The Assistant Secretary for Productivity,  
 Technology and Innovation  
 Washington, D.C. 20230  
 (202) 377-3444



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January 15, 1981

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 this orig to:  
 Trotter  
 Schubert 8/12/81  
 T. Alexander*

Mr. Ray G. Smith  
 Acting Director  
 Office of Standards Development  
 U. S. Nuclear Regulation Commission  
 Washington, D.C. 20555

Dear Mr. Smith:

Thank you for your letter of December 23, 1980, to Dr. Jordan J. Baruch, Assistant Secretary of Commerce for Productivity, Technology, and Innovation, in which you request this Department (DoC) to establish, in accordance with the National Voluntary Laboratory Accreditation Program (NVLAP) Procedures (15.C.F.R. Part 7b) for Federal agencies, a program for accrediting processors of personnel dosimeters that measure ionizing radiation received occupationally by radiation workers.

We have forwarded your request to the National Bureau of Standards (NBS), which provides the technical support for NVLAP. Members of my staff and those of NBS, who have already been working informally with members of your staff, will continue with this effort.

We understand that details of a memorandum of understanding (MOU) between NRC and DoC are being worked out between Ms. Nancy Dennis of your staff and Margaret Federline of our NBS/NVLAP staff (301/921-2427). We agree with the need for keeping all interested agencies informed of the progress of this program and are most willing to participate regularly at forthcoming meetings of the Interagency Policy Committee for Personnel Dosimetry (IPCPD).

In accordance with NVLAP Procedures, we will shortly be publishing in the Federal Register a notice announcing receipt of your request.

If you have any questions regarding the progress of the program, please contact John W. Locke, NVLAP Coordinator (202/377-2054). He is available to answer any general or policy questions. Ms. Federline can be contacted regarding technical details of the program.

We look forward with pleasant anticipation to working with you on an important project in the public interest.

Sincerely,

*Howard I. Forman*  
 Howard I. Forman  
 Deputy Assistant Secretary  
 for Product Standards Policy

## Office of Secretary

## Request From the Nuclear Regulatory Commission for a National Voluntary Laboratory Accreditation Program for Radiation Dosimetry

In accordance with the procedures of the National Voluntary Laboratory Accreditation Program (NVLAP); Federal government (15 CFR Section 7b.4(c)), the Department of Commerce publishes as part of this notice a request from the Nuclear Regulatory Commission (NRC) dated December 23, 1980 to develop a program for accrediting processors of personnel dosimeters that measure ionizing radiations received occupationally by workers. In effect, processors may be considered testing laboratories which measure the amount of ionizing radiation received on personnel dosimeters.

The NRC request in turn references an advance notice of rulemaking (45 Fed. Reg. 20493(1980)). The request and advance notice, taken together, constitute the statement of need required by 15 CFR Section 7b.4(b)(4) and the procedures followed in making the determination. The Statutory authority of the NRC to make such a determination is specified at the beginning of 10 CFR Part 20. Under this set of regulations, the NRC requires its licensees to have adequate precautionary procedures to protect the health and safety of licensee personnel and the public against radiation hazards arising from licensee activities.

The NRC request refers to personnel dosimetry program quality assurance criteria which are to be recommended by the Personnel Dosimetry Overview Committee. These criteria might simply provide the elements of current NVLAP laboratory accreditation criteria (45 FR 5572-5600) to be used in accrediting processors. In that event, an NRC draft standard would not be necessary in accordance with NVLAP procedures in order to proceed with the program. Whatever NRC decides to recommend, processors and other interested parties will have an opportunity to comment on proposed criteria when DOC publishes them in the Federal Register. It is only after comments on the proposed criteria have been analyzed and resolved that the final criteria will be published and processors will be offered the opportunity to apply for accreditation.

Any comments as to the need for this program should be made within 60 days directly to NRC, Ms. Nancy Ann Dennis, Occupational Health Standards Branch, Office of Standards Development, Washington, D.C. 20555 (301/443-5970). A copy of such comments should be sent to Mr. John W. Locke, NVLAP Coordinator, Room 3876, U.S. Department of Commerce, Washington, D.C. 20230 (202/377-2054). Additional inquiries related to NVLAP can also be directed to Mr. Locke.

Dated: January 26, 1981.

Robert B. Ellert,

Acting Assistant Secretary for Productivity, Technology and Innovation.

United States Nuclear Regulatory Commission

December 23, 1980.

Honorable Jordan J. Baruch,

Assistant Secretary for Productivity,

Technology and Innovation, United States Department of Commerce, Washington, D.C. 20230.

Dear Mr. Baruch: The Nuclear Regulatory Commission (NRC) requests, in accordance with Section 7b.4 of Title 15 of the Code of Federal Regulations, that the Department of Commerce (DOC) and NRC work together to establish a laboratory accreditation program for processors of personnel dosimeters that measure ionizing radiation received occupationally by radiation workers. This program would be based upon the American National Standards Institute (ANSI) N13.11 Standard, Criteria for Testing Personnel Dosimetry Performance, and a personnel dosimetry quality assurance standard currently being developed, for NRC consideration, by the Personnel Dosimetry Overview Committee which was formed to ensure that any proposed regulatory action will be effective and appropriate to the need.

The NRC has been working to establish a certification program for personnel dosimetry processors in order to improve the accuracy of reported dose measurements made for NRC licensees by personnel dosimetry processors. It is estimated the NRC licensees currently compose approximately twenty percent of the 1.1 million workers in the United States that require personnel monitoring as a result of their potential exposure to ionizing radiation of all kinds. NRC licensees are required to perform personnel monitoring as prescribed in 10 CFR Part 200, Section 20.202 and to record and maintain radiation exposure records as specified in 10 CFR Part 20, Section 20.401. The personnel dosimeter is carried or worn by each worker to measure the exposure received during work. Dosimeters are collected at various prescribed time intervals by the licensees and then processed by a dosimetry service which may be provided by the licensee in-house or through the use of commercial processors.

There are approximately seventy dosimetry processing services or organizations in the U.S. Because of the critical nature of these measurements and the poor performance of dosimetry processors during recent performance tests performed by the University of Michigan for the NRC which were described in an Advance Notice of Rulemaking on Certification of Personnel Dosimetry Processors (45 FR 20493), there is a need to evaluate the performance of each dosimetry processor periodically and to make a specific determination as to competence.

As part of this proposed joint effort, the NRC will submit recommended general and specific criteria to be used in accrediting personnel dosimetry processors (laboratories). This recommendation will include consideration of those quality assurance requirements which NRC believes to be essential as well as the NVLAP general and specific criteria currently in use.

NRC recognizes that additional development work is needed to refine the specific details of the proposed program for accreditation of personnel dosimetry processors before the program could be implemented. NRC is willing to financially support this effort and suggests that the details of such support be included in a Memorandum of Understanding (MOU) to be developed between DOC and NRC. Details of NVLAP and NRC coordination and several other matters such as the source of NVLAP inspectors and appeal procedures can be included in the MOU. NRC is also concerned that all interested agencies be informed of the progress of the program as it develops and proposes that this matter be a regular agenda item at forthcoming meetings of the Interagency Policy Committee for Personnel Dosimetry (IPCPCD). The IPCPCD is composed of representatives of Bureau of Radiological Health (BRLH), the Department of Defense (DOD), the Department of Energy (DOE), the Environmental Protection Agency (EPA), the National Bureau of Standards (NBS), the NRC, the Occupational Safety and Health Administration (OSHA), and the Conference of Radiation Control Program Directors (States). The IPCPCD was formed in 1977 to guide and coordinate correction of the dosimetry processors' performance problem so that intra-agency rules similar to NRC regulations may be adopted.

Ms. Nancy Ann Dennis, Occupational Health Standards Branch, 301/443-5970, is the NRC staff contact for this effort.

Sincerely,

Ray G. Smith,

Acting Director, Office of Standards Development.

(FR Doc. 81-3329 Filed 1-28-81; 8:45 am)

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