STATE OF CALIFORNIA-HEALTH AND WELFARE AGENCY

EDMUND G. SROWN JR., Gov

DEPARTMENT OF HEALTH SERVICES 714/744 P STREET SACRAMENTO, CA 95814

(916) 323-2767

March 25, 1981

PROPOSED RULE PR-20 45 FR20493

F. 1-1, P.J.20

Nancy Ann Dennis Occupational Health Standards Branch Office of Standards Development Washington, D. C. 20555

Dear Ms Dennis:

Mr. Joseph Ward, Chief of this Section, has asked me to express our comments to you regarding the proposal to develop a program for accrediting processors of personnel dosimeters under the National Voluntary Laboratory Accreditation Program.

We wholeheatedly support such a proposal. We believe that accurate personnel monitoring is an important facet of radiation protection, that it is difficult to achieve, and that inaccurate personnel monitoring has little value.

Our past experience has led us to believe that many companies providing personnel monitoring services are not able, or do not choose, to provide adequate services.

We believe that dosimeter processors should be evaluated and monitored by an impartial agency, and that ongoing, unannounced tests should be established to ensure that each accredited processor is providing accurate results to its clients.

PUUR IRIGINAL

Thank you for the opportunity to express our opinions.

Sincerely.

Robert England, Supervisor X-radiation Control Unit Radiologic Healt's Section

cc: John W. Locke, NVLAP Larry Lloyd

8105190621