



DEPARTMENT OF THE NAVY
 NAVAL FACILITIES ENGINEERING COMMAND
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Secretary of the Commission
 U.S. Nuclear Regulatory Commission
 Washington, D.C. 20555

Attention: Docketing and Service Branch

Dear Sir:

Acknowledged by card... *SCA-9/5/80*

The following comments are offered regarding the Proposed Revision 1 to Regulatory Guide 10.6, Guide for the Preparation of Applications for Use of Sealed Sources and Devices for Performing Industrial Radiography:

1. Item 6.g., page 8, states "Internal inspections, including evaluation of each radiographer, should be made by a person of authority in management". The primary purpose of an internal audit program is to insure that radiographic personnel are performing in accordance with the licensee's operating and emergency procedures, Commission regulations, and license conditions. Radiography personnel are required to maintain detailed records so that audit personnel can review records and operations to measure compliance. The frequency of personal audits of any individual radiographer or radiographic assistant is a matter which should be reserved for management. A quarterly audit of each such individual is not required to insure that the primary purpose of the audit program is fulfilled. The Navy's position is that supervision, regular audits and training, both initial and periodic, are much more effective than individual audits in insuring that radiographic personnel are performing in accordance with the licensee's operating and emergency procedures, NRC regulations and license conditions.

2. Appendix B, section c, page 16 states "A specification of a radiation level of 2 milliroentgens per hour for the boundary of the restricted area and 100 milliroentgens per hour for the boundary of the high radiation area is acceptable". The standard established by 10 CFR 20.105(b)(1) is that radiation levels which if an individual were continuously present in the area, must not result in his receiving a dose in excess of two millirems in any one hour. At temporary job sites, radiography operations are often concluded in less than one hour. Restriction of a radiation level to an instantaneous exposure rate of two milliroentgens per hour at the boundary is unnecessarily restrictive. Failure to discuss this method of control at temporary job sites will result in increased review time by NRC staff.

3. Appendix B, section e, requires immediate processing of an individual's film badge or TLD if that individual's pocket dosimeter is discharged beyond its range. Standard Navy practice has been to require radiographers to wear two

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pocket dosimeters. This practice was initiated because pocket dosimeters are subject to damage and leakage. Processing of film badges/TLDs caused by defective pocket dosimeters resulted in unnecessary and unreasonable delays caused by the return of the film badge/TLD to a centralized dosimetry processor for the Navy. If only one pocket dosimeter was off-scale and an evaluation by the Radiation Safety Officer indicated that the dosimeter was defective or damaged, the radiographer could return to work without processing of the film badge/TLD and without further delays. If the one dosimeter cannot be proved defective or if both dosimeters were off scale, it is presumed that an exposure could have occurred and the film badge/TLD is processed immediately. The intent of 10 CFR 34.33(d) is to require processing of the film badge/TLD upon positive indication of an exposure greater than 200 mR from the pocket dosimeter. It is recommended that an acceptable procedures for wearing two pocket dosimeters as discussed above be included in the regulatory guide.

4. It is noted that requirements for 10 CFR 21 reporting are not discussed.

It is felt that favorable consideration of the Navy's position will in no way decrease radiation safety and will avoid undue and unnecessary administrative and operational requirements which would significantly increase operational time and costs.

Copy to:
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