



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

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Mr. Curtis L. Graham, Chairman
Health Physics Society Subcommittee
on Internal Dosimetry Standards
for Tritium
Lawrence Livermore Laboratory
University of California
P. O. Box 808
Livermore, CA 94550

Dear Curtis:

I have reviewed the draft of the Subcommittee on Internal Dosimetry Standards for Tritium that arrived with your letter of March 16 and find that it reads much more smoothly and contains good information. I believe that we are approaching a final product that will be useful. However, I see that the approach that I suggested for Table 5, which is the approach adopted as an interim branch position consistent with staff views in two of our NRC offices, has not been adopted. I will not repeat in detail the reasons why I support the simpler approach, as given in my previous letters. However, if we do use the Table 5 as given in your current draft, I feel there is need for some serious consideration of certain changes:

- 1) Again I feel that if activities in process are to be disregarded below certain concentration levels then the concentration levels in Table 5 are about a factor of 10 too high. I base this belief on the field experience I presented to you earlier and feel that a conservative approach should take into account this experience despite the experiments by Jalbert and Killian. For example, according to the criteria in Table 5 currently in the draft, an individual could work with a new batch of 900 millicuries in process in a fume hood each day for 120 consecutive days without bioassay being required. I believe that most knowledgeable health physicists will not find this acceptable, nor is it likely in my opinion to be acceptable to NRC. I would also like to request, since it seems to me at our earlier meetings that the majority of the members of our subcommittee supported the simpler approach as currently presented in the branch position sent to you earlier, that we reconsider the matter and take a vote at the next meeting regarding the majority position of the committee. I feel that we could easily change the format of Table 5 without too much revision of the text.

I have some further comments written into the text of the draft, which I will return to you under separate cover. I hope these comments are helpful.

Sincerely,

(S)

Allen Brodsky, Sc.D.
Occupational Health Standards Branch
Office of Standards Development

cc: Members of Subcommittee

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