



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

January 31, 1979

MEMORANDUM FOR: Walt Cool
FROM: Allen Brodsky
SUBJECT: COMMENTS ON NMSS POSITION ON ANSI STANDARD N721,
"INTERNAL DOSIMETRY STANDARDS FOR TRITIUM"

In reply to your request for comments on the NMSS position on the ANSI tritium bioassay standard, I concur in their position and believe that the points raised in Cunningham's memo¹ are all well taken. As a participant in the ANSI Working Group, I attempted to persuade the Group to adopt a simpler approach, more similar to the one in the interim branch position² worked out between OHSB and NMSS staff in 1977. However, the chairman of the Working Group and two other members were rather strong in pursuing their own approach, so I compromised as a member of the Working Group in order to at least allow some of the worthwhile information in the ANSI document to go forward.

I wish to point out that the branch position as worked out in 1977 utilized information that I had collected and presented to the ANSI Working Group, and this information is still available for developing our own guidance. The Campus Radiation Safety Officers' Conference in 1977 also adopted a similar approach to the bioassay program criteria utilized in the branch position presently used by NMSS. Thus, I believe a considerable consensus has already been established that we can build upon if we desire to develop a regulatory guide similar to the branch position, and also somewhat similar to the approach of Regulatory Guide 8.20 on bioassay of I-125 and I-131. There is also some additional empirical data now available that I believe can be used to establish suitable "throughput" criteria as suggested in item 2, page 2, of Cunningham's memo. I also believe we can address, in cooperation with NMSS technical staff, the other suggestions in that memo. We may still, however, want to at least reference some of the information in the ANSI standard when it is finally published, even if it then is still not exactly what we need for our licensing programs.

Allen Brodsky
Allen Brodsky

cc: R. E. Alexander
R. E. Cunningham
D. A. Nussbaumer

References 1 & 2: See next page

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¹Memo from R. E. Cunningham to K. Goller dated January 23, 1979, subject: Technical Review of Proposed ANSI Standard N721, "Internal Dosimetry Standards for Tritium."

²Memo from R. E. Alexander to B. Singer dated October 27, 1977, subject: Guidelines for Bioassay Requirements for Tritium.