



DEPARTMENT OF THE ARMY  
CRANE ARMY AMMUNITION ACTIVITY  
300 HIGHWAY 361  
CRANE INDIANA 47522-5099

DOCKETED  
USMRC



May 26, 1994

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REPLY TO  
ATTENTION OF

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Safety Office

Secretary  
U.S. Nuclear Regulatory Commission  
Attention: Docketing and Service Branch  
Washington DC 20555

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH  
DOCKET NUMBER  
PROPOSED RULE PR 34-150  
(59 FR 9429)

Dear Sir:

This is in response to the proposed rule on 10 CFR Parts 34 and 150 published in the Federal Register on February 28, 1994. Section 34.47(a)(3) states that TLDs must be replaced at least monthly. We feel that this is excessive and will increase costs without providing any increase in safety. We proposed that TLDs be replaced at a maximum of once per quarter, especially for facilities that have documented proof of a maximum exposure for any one person of less than one rem per year. Facilities that have exposures greater than one rem per year could be required to decrease their replacement period.

At present, our installation replaces TLDs quarterly. They are then sent for processing at another installation. Our annual cumulative readings for the TLDs, and previously for film badges, have never exceeded one rem per year in any of the past ten years. As required, our radiographers wear two pocket dosimeters in conjunction with the TLDs. If either of these dosimeters went off scale, we would immediately have the TLD processed. This procedure ensures that exposures are recognized immediately so that correct measures can be implemented immediately. Changing the TLDs monthly instead of quarterly would have no valid safety impact on this process.

If you have any questions regarding my comments, I can be reached at 812-854-1246. Thank you for your consideration.

Sincerely,

Walter F. Shearin  
Chief, Safety Office/Radiation  
Protection Officer

Copies Furnished:

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U.S. Army Armament, Munitions and Chemical Command, ATTN: (AMSMC-SF), Rock Island, IL 61299-6000

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