



NORTH DAKOTA
STATE DEPARTMENT OF HEALTH

State Capitol
Bismarck, North Dakota 58505

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State Health Officer

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Environmental Health Section
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OFFICE OF SECURITY
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BRANCH

November 24, 1982

Mr. Nunzio J. Palladino
Chairman
Nuclear Regulatory
Commission
Mail Stop H-1149
1717 H Street NW
Washington, DC 20555

73

INDEX NUMBER
PROPOSED RULE PR-20
(45 FR 20493)

Re: Personnel Dosimetry Processing Accreditation Program

Dear Mr. Palladino:

At this time this Department would like to take the opportunity to express its support for the need for approved personnel dosimetry processing. Since federal and state regulations have established standards which limit radiation doses and require personnel monitoring to measure the radiation exposure received during work, it is necessary that personnel dosimetry provide reliable measurements. If the monitoring and measurement of radiation work or doses are to be considered important, it should be considered important that these measurements be reliable and accurate.

This Department has been informed that some of the dosimetry processors, during recent tests conducted by the University of Michigan for the NRC, have indicated poor performance. In addition, because of dosimetry processors failure to participate in the testing and certification program offered by the National Sanitation Foundation during the 60's, there is evidence that a mechanism which would assure acceptable limits of personnel dosimetry processing should be established.

It may well be that the only acceptable way under which a testing and accreditation program can be effectively implemented is to require such a program by regulation.

Sincerely,

Dana K. Mount, P.E.
Director, Division of
Environmental Engineering

DKM/JLB:dm

cc: Victor Gilinsky
John Ahearne
Thomas J. Roberts
James J. Asseltine

DS 10
add: Robert Alexander
5650 NW

Acknowledged by card 11/30/82 emp

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November 22, 1982

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Nunzio J. Palladino, The Chairman
Nuclear Regulatory Commission
Mail Stop H-1149
1717 H. Street, N.W.
Washington, D.C. 20555

DOCKET NUMBER
PROPOSED RULE

72
PR-20

(45 FR 20493)


Dear Chairman Palladino:

This letter is written in support of NRC proposing an amendment to 10 CFR 20 which would require NRC licensees to use personnel dosimetry services accredited under the NVLAP program.

Currently the regulations require that any individual in a restricted area not receive in any one calendar quarter more than a specified total occupational dose and that the licensee shall supply appropriate personnel monitoring equipment to individuals who (1) receive or are likely to receive 25 percent of these limits; (2) to individuals under 18 years of age who receives or are likely to receive 5 percent of these limits; or (3) to individuals who enter high radiation areas. The definition for personnel monitoring equipment describes it as "devices designed to be worn or carried by an individual for the purpose of measuring the dose received," however, it does not refer to the ability or accuracy of these devices.

In practice, regulatory personnel and licensees have assumed that these devices are approximately 100% accurate. Recent tests of the Health Physic Society personnel dosimetry testing standard have shown that this is not the case. Although this study was free, it is our understanding that not all personnel dosimetry processors participated. Therefore, in order for all processors to participate there should be a mechanism to make the accreditation mandatory. By requiring the licensee to use an accredited processor, participation would essentially be mandatory for the processors. As long as we rely on these devices and their ability to accurately measure exposure, there needs to be a quality assurance program such as NVLAP to add a degree of confidence to health physics decisions, especially when an incident occurs.

Sincerely,


Bobby G. Rutledge, Director
Radiological Health Section

BGR/CC/fp

cc: Victor Gilinsky
John Ahearne
Thomas M. Roberts
James J. Asselstine

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DEPARTMENT OF HEALTH SERVICES

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DOCKET NUMBER
PROPOSED RULE **PR-20**
(45 FR 20493)

Nunzio J. Palladino, The Chairman
Nuclear Regulatory Commission
Mail Stop H-1149
1717 H Street, NW
Washington, D.C. 20555

Dear Sir:

The California Department of Health Services strongly recommends the adoption of the proposed 10 CFR 20 amendments by the NRC to require that all NRC licensees use personnel dosimetry services that are accredited under the National Voluntary Laboratory Accreditation Program (NVLAP) and that licensees maintain records showing that their personnel dosimetry services are accredited.

The need for the mandatory testing and accreditation of personnel dosimetry processors is eminent. The participation in a voluntary testing program conducted by the National Sanitation Foundation (NSF) during the 1960s was poor (only a few of the processors participated). The recent tests conducted by the University of Michigan for the NRC revealed apparent poor performance of some processors. Personnel dosimetry measurements, which serve as the basis for licensee, state and NRC records of external radiation doses to workers, cannot tolerate gross inaccuracies. Good health physics practice and judgement depend on reasonably accurate personnel dosimetry measurements.

Presently, the only effective means of implementing a mandatory testing and accreditation program is by amendment of 10 CFR and subsequently the same amendment be adopted by the Agreement States.

Sincerely,

Gerard C. Wong

Gerard C. Wong, Ph.D.
Senior Health Physicist

for Radiologic Health Branch

cc: Commissioner Victor Gilinsky
Commissioner John Ahearne
Commissioner Thomas M. Roberts
Commissioner James J. Asselstine

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Acknowledged by card.....11/30/82 emp

DEPARTMENT OF HEALTH AND ENVIRONMENTAL SCIENCES

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November 23, 1982

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DOCKET NUMBER
PROPOSED RULE PR-20
(45 FR 20493)

Nunzio J. Palladino, Chairman
Nuclear Regulatory Commission
Mail Stop H-1149
1717 H Street
Washington, D. C. 20555

Dear Chairman Palladino:

I understand that the Commission will soon be hearing a request by NRC staff to make an amendment to 10 CFR 20 which would require NRC licensees to use personnel dosimetry services from processors that are accredited by the National Bureau of Standard's National Voluntary Laboratory Accreditation Program (NVLAP).

We in Montana have been concerned about the apparent inaccuracies of dose assessments reported by personnel dosimetry processors for many years. Tests of the personnel dosimetry processors performed by Battelle Northwest Laboratories and, more recently, tests performed by the University of Michigan for the NRC have shown extremely poor performance by some processors.

Reasonable accuracy of personnel dosimetry dose assessments is necessary because of the importance of these records to the licensees and to state and federal regulatory agencies.

A mandatory program for the testing and accreditation of personnel dosimetry processors is needed to ensure acceptable performance and reporting by the processors. An attempt by a private organization during the 1960's to test and accredit personnel dosimetry processors failed. This failure was largely responsible to the fact that the testing and accreditation program was not mandatory and most processors declined to participate.

I urge you to favorably consider the NRC staff request to amend 10 CFR 20 to require NRC licensees to utilize NVLAP accredited personnel dosimetry services. This amendment is the only effective way in which the badly needed personnel dosimetry processor accreditation program can be implemented.

Sincerely,

Larry L. Lloyd
Larry L. Lloyd
Chief

*add: Robert Alexander
5650 NL*

LLL:kh

cc: Victor Gelinsky
John Ahearne
Thomas M. Roberts
James J. Asseltine

AN EQUAL OPPORTUNITY EMPLOYER

Acknowledged by card... 11/30/82 exp