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PROPOSED RULE PR-20  
(49 FR 1205) (19)

# Bethlehem Steel Corporation

BETHLEHEM, PA 18016

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FEBRUARY 13, 1984  
DOCKETING & SERVICE  
BRANCH

Secretary of the Commission  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

ATTN: Docketing and Service Branch

Gentlemen:

This is in response to the proposed rule, "Improved Personnel Dosimetry Processing", 10 CFR 20.202 and 10 CFR 20.401, published in the January 10, 1984, Federal Register, Vol. 49, No. 6, pages 1205 through 1211.

Bethlehem Steel Corporation believes that 20.401(d) is a burdensome regulation that will increase paperwork, and that the desired effect of the regulation can be achieved in a more cost efficient way.

Bethlehem Steel Corporation has 18 facilities throughout the country where personnel monitoring dosimeters are worn. Under the proposed 20.401(d), our corporate health physicist would have to assure that each location possesses a certificate that states that our processor is accredited. Since Bethlehem uses a single processor for all its facilities, this assurance audit would not add to the health and safety of its workers, nor affect a reduction in personnel exposure. It would, however, cause added work (with no benefit) and create the possibility of citations and potential fines because a facility failed to maintain a certificate - even though the facility knew the processor to be accredited.

Since there will be a limited number of accredited processors, especially commercial processors, it is suggested that NVLAP periodically publish lists in the Federal Register of accredited processors. NRC and state inspectors could obtain the lists and know if a processor were accredited. The lists could also be used to inform new licensees of accredited processors.

We request that the above comments be considered by the Commission as it finalizes amendments to Part 20 in this matter.

Sincerely yours,

*A. E. Moffitt Jr.*  
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Manager of Occupational Health and Safety

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