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Rules and Directives
Branch
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March 2, 2001

Rules and Directives Branch
Office of Administration
US Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject Draft Regulatory Guide DG-8026

Dear Sir or Madam:

I have a comment on the subject Draft Regulatory Guide. In Section 2.2, the guidance suggests that the quantity of air sampled and the method of analysis should allow an LLD of ~10% of the limit in Appendix B to 10 CFR 20. This statement is preceded by a discussion on intake and breathing zone monitoring. I think that this confuses the issue of using BZAs for intake assessment and dose assignment. The LLD should relate to a quantity of material on the filter that corresponds to a certain intake by a worker (e.g., one mrem would be equal to 1/5000 of ALI). When air samplers are used to determine concentration do demonstrate compliance with Airborne Radioactivity Area posting requirements, the LLD should be related to the Appendix B concentration.

Sincerely,



B. Scott Davidson
Certified Health Physicist

ADMO3

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