

DOCKET NUMBER

PETITION FILE PRM 20-25
(68FR 23618)

June 16, 2003 (4:33PM)

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

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June 14, 2003

Secretary
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
ATTN: Rulemakings and Adjudications Staff

Subject: Comments on Petition for Rulemaking, Docket No. PRM-20-25

I support the intent of this petition, which will assure that dosimetry used to assign dose to individuals who are monitored for occupational radiation exposure are monitored with dosimetry that is required to meet applicable quality standards. However, I believe that the proposed regulatory wording needs clarification. I have two concerns:

(a) Most nuclear power reactors assign secondary dosimetry, in addition to the primary dosimetry, to individuals who are monitored for occupational radiation exposure. The primary dosimetry is the dose of record. The secondary dosimetry is used to provide an instantaneous indication of dose rate and accumulated dose. In the event that a person's primary dosimetry is lost or unreadable, the secondary dosimetry is used as part of an investigation to assign dose. The proposed wording could be interpreted as requiring NVLAP accreditation for secondary dosimetry, because of its contingency use to assign dose. Since this is not the intent of this petition for rulemaking, the wording should be clarified to avoid the need for secondary dosimetry NVLAP accreditation.

(b) The proposed wording defines a personal (lapel) air sampler as an "individual monitoring device." This may be interpreted as requiring NVLAP accreditation for lapel samplers, since they may be used to assign CEDE. The wording should be clarified to remove the need for NVLAP accreditation of lapel samplers.

My proposed wording is:

20.1003 Definitions

"Personnel Dosimeter" means a monitoring device worn by a single individual for the assessment of deep dose equivalent, lens dose equivalent, and/or shallow dose equivalent; and used for the purpose of demonstrating compliance with the applicable Occupational Dose Limits of Subpart C and providing data used to prepare records required by paragraph 20.2106.

"Secondary Personnel Dosimeter" means a monitoring device worn by a single individual for the purpose of providing an immediate indication of ambient external dose equivalent rate or accumulated dose equivalent, for the purpose of providing an assessment of deep dose equivalent, lens dose equivalent, and/or shallow dose equivalent in the event of personnel dosimetry failure, or for both purposes. A Secondary Personnel Dosimeter is

Template = SECY-067

SECY-02

William V. Lipton

June 14, 2003

page 2

not considered Personnel Dosimeter if an individual wearing a Secondary Personnel Dosimeter is also wearing a Personnel Dosimeter.

20.1501 General

...

(c) All Personnel Dosimeters must be processed and/or evaluated by a dosimetry processor –

(1) Holding current personnel dosimetry accreditation from the National Voluntary Laboratory Accreditation Program (NVLAP) of the National Institute of Standards and Technology; and

(2) Approved in this accreditation process for the type of radiation or radiations ...[same as existing wording]

Submitted by William V. Lipton ScD, CHP, CHMM