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USNRC

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Comments on subject Proposed Rule,

1.

The suggested language-

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PETITION RULE PRM 20-25

(68FR 23618)

OFFICE OF SECRETARY
RULEMAKINGS AND
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§ 20.1501 General.

(c) All personnel dosimeters used to determine the radiation dose and that are used by licensees to comply with 10 CFR 20.1201, with other applicable provisions of this chapter, or with conditions specified in a license, must be processed and/or evaluated by a dosimetry processor.

actually appears to remove the requirement for the NVLAP certification if it deletes the paragraphs that currently follow it which explicitly refer to NVLAP. The current paragraph (c) ends with an en dash "-". Whereas the new paragraph ends with a period.

2.

The regulations should allow use of non-NVLAP accredited devices and programs for dosimetry worn along-side other accredited devices. It appears the rules would already permit this, and the allowance of this practice should continue because in many cases the additional dosimetry is used to provide immediate response whereas the record device is processed long after exposure.

3.

The proposed regulation could force a licensee to hire a third party to oversee and implement its use of electronic dosimeters. A licensee might have no other recourse if its in-house dosimetry program failed to be certified.

4.

Some consideration should be given to three points that counsel against adding additional requirements involving NVLAP certification:

A. Since the doses ordinarily measured are small in terms of observable biological effects on humans, the insistence on increasingly high degrees of accuracy and precision is misplaced (especially so for extremity dosimeters). The NRC should consider the reasonableness and ease of compliance with this proposed rule before implementing it.

B. Modern dosimeters are inherently more accurate and reliable than those in use at the time when NVLAP certification was added to the regulations. Therefore the need for NVLAP supervision is diminished.

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C. It seems as though the NRC is delegating its authority under the AEA to NVLAP. This raises an issue as to how a licensee would be treated in the event its vendor's certification was revoked or suspended. For example, would a power plant have to suspend a refueling outage if it discovered that NVLAP had removed the certification of its dosimetry vendor?

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