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6/6/79

From:

ROBERT E. ALEXANDER
SD. OHSB

Please place the attached document in the PDR using the following file and file points:

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Federal Register Notice _____
SD Task No. OH 506-1
NUREG Report _____
Contract No. _____

Subject:

Performance Testing of Personnel
Documentation

(10 CFR 20)

cc:
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UNITED STATES DEPARTMENT OF COMMERCE
National Bureau of Standards
Washington, D.C. 20234

April 6, 1979

Mr. Robert E. Alexander
Office of Standards Development
Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Bob:

As you know I am transferring to DOE to be Associate Director, High Energy and Nuclear Physics, Office of Energy Research. However, before I leave NBS I wanted to express to you my feelings about the Interagency Policy Committee of Personnel Radiation monitoring and the activities of this Committee.

It is very clear to me that there is considerable national concern as to whether government at all levels is really doing its job to ensure the safety of radiation workers and the public from radiation hazards. One source of this concern is the lack of coordination and communication among agencies. Viewed in this perspective, the Interagency Policy Committee is an experiment to demonstrate that agencies can sit down together voluntarily and take coordinated action. I believe we have made a good start and strongly encourage you and others to keep this effort going, and to expand it. I am particularly pleased at your cooperation and efforts to make this experiment work.

One very difficult question which you raised at the last policy meeting relates to the actions NRC should take in light of the results to date of the University of Michigan testing program. Clearly these results show that a large fraction of personnel dosimetry processors are not able to meet the new testing standard, although each test is met by some groups.

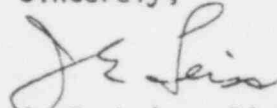
A clear understanding of why the processors do not meet the tests is not yet available. I consider it very important to continue your efforts, either by extension of the Michigan contract or by an independent contract, to determine the causes of failure to meet these tests. To not continue would be a great waste, and would throw a large cloud over proposed regulations which you will need to put into effect. To me it is just this type of regulatory research which NRC was instructed to do when NRC was formed. In essence it is research to ensure that the personnel monitoring numbers reported to you are correct. If the reasons

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for failing to pass a measurement quality assurance test are deeper than just careless performance on the part of processors, you need to know this. A study of causes of failure to pass the test is the only way to answer these questions.

The views I have expressed above about continuing your efforts were almost universally expressed by all agencies at the last Interagency Policy Committee meeting. I hope it will be possible for you to follow this course of action.

Sincerely,

A handwritten signature in dark ink, appearing to read "J. E. Leiss". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

J. E. Leiss, Director
Center for Radiation Research

cc: R. Minogue, NRC
E. Eisenhower

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