



UNITED STATES DEPARTMENT OF COMMERCE
National Bureau of Standards
Gaithersburg, Maryland 20899

May 10, 1985

Mr. Thomas T. Martin
Division of Radiation and Safeguards
U.S. Nuclear Regulatory Commission -
Region I
631 Park Avenue
King of Prussia, PA 19406

Dear Sir:

Reference: Docket No. 50-184, Inspection No. 50-184/85-01

This is in response to the above subject inspection report. NBS was always aware that there are a few spots in the process room that exceeded 100 millirems per hour (mrem/hr) at the surface of the primary system and has carefully identified and labeled them. These spots are small, isolated, localized, transient areas that are not easily accessible. They form an insignificant fraction of the large volume of the process room. It is highly unlikely that anyone could receive an exposure of 100 mrem in one hour to a major portion of the body in the vicinity of any of these areas. Since the process room itself is not a high radiation area and visual contact cannot be maintained between the process room entrance point and all parts of the process room, the only way to have provided the positive control required in the NRC inspection report for these few obscure and remote spots would have been to post personnel inside the process room which would have resulted in needless exposure. This would not be in line with 10 CFR 20.1 (c) concerning ALARA (as low as reasonably achievable).

It has always been the policy of NBS to keep exposures to all personnel to a minimum. During the more than 6 months of outage, NBS has gone to great lengths and expense in order to provide additional shielding, replace radioactive components, exchange radioactive heavy water, and delayed scheduled work to allow for radioactive decay solely for the purpose of reducing exposures and releases. It is the NBS view that this NRC action is a very narrow, if not incorrect, application of the spirit and intent of 10 CFR Part 20 and that the additional measures being required by NRC are unnecessary and counter-productive. With this understanding, NBS reluctantly will provide the positive control over these and similar areas required in the subject report effective immediately.

Sincerely,

Robert S. Carter
Chief, Reactor Radiation Division

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