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From: Martha G Dibblee <Martha_G_DIBBLEE@ohdmail.hr.state.or.us>
To: TWD2.TWP6(mtl)
Date: 1/6/97 4:17pm
Subject: Comments re: PG guide NUREG 1556 (NUREG/BR-0177, No. 96-3)

(2)

Keep the Guidance SIMPLE for the applicant. "User Friendly" means EASY.

NUREG-1556 is a very good didactic manual for regulators & persons who want to know "all about" portable gauges. It is NOT a good guide for the average small engineering company that has only a few gauges & authorized users.

Our experience has shown that an applicant will READ & UNDERSTAND the guide if it's simple, clear, & short. Most licensees don't need to understand why film badges work, they just must know that they have to use them & they have to be NVLAP approved. Applicants simply WILL

NOT read a lengthy guidance document. They don't have time. If a document is too long to read they will take our time to ask questions.

We've found that simplicity is the key. We don't get bogged down w/ unnecessary phone calls & the applicant can prepare the application by himself.

Applicants don't have to understand how a survey instrument works, but they do need to understand that if their device is run over, they must call someone who knows what to do. Whether their emergency procedure includes their own response team & instruments or someone else's approved by the Agency is irrelevant

The applicant must be able to make the device secure & safe. They must understand why a sealed source leak test must be done. They must understand that they are responsible for receipt, transfer, & disposal records.

Applicants & licensees must understand how to properly transport devices & to keep the devices secure & away from danger. They must know how & where NOT to store the devices to prevent unnecessary public exposure.

Licensees must understand how to use the device to make measurements so they can make a living. They must understand that their users must be trained by the manufacturer or an authorized person.

They need to understand basic dosimetry, safety, & use requirements.

Other than these few requirements, applicants don't need many health physics procedures to use these devices.

More is not necessarily better for these applicants, as well as for ECD & FG applicants. Our experience shows that a custom application ("okey-dokey") works exceptionally well, is easy to complete, & provides both the Agency & the applicant w/ enough information to issue the specific license.

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