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ENGINEERING AND ENVIRONMENTAL SERVICES, INC.

61 FR 51729

Oct. 3, 1996

January 9, 1997

Chief, Rules Review and Directives Branch
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Comments on NUREG-1556, Volume 1
License No. 35-27045-01

In performing an internal audit of our nuclear gauge operations, using NUREG-1556, Volume 1, Appendix F, we required clarification on the requirements for Survey Meters. Paragraph 8.13, Item 10 states, "A radiation survey meter should...be capable of detecting the type of radiation emitted by the sealed source."

Our experience was that a Gamma-detecting survey meter was sufficient for our operations. This was based on state and federal audits of our operations in various states over the past 20 years. However, since our Troxler Model 1311 moisture-density gauges emit both Gamma and Neutron radiation, this Paragraph would indicate that both Gamma and Neutron-detecting survey meters would be required.

A clarification was received from NUREG-1556 author Mr. Jack Whitten that only Gamma-detecting survey meters would be sufficient for our operations. If this is the case, we request clarification to this Paragraph of the regulation. Thank you for the opportunity to provide input to this important document.

Sincerely,

Law Engineering & Environmental Services, Inc.

John S. Landwermyer, P.E.
Radiation Safety Officer

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ISP-11 Guides & Manuals