

DML:mb

bec: w/cpy ltr dtd 2/23/72

PDR

NSIC

SLR

DML:MB

L. Kornblith, Jr.

C. F. Eason, AWCRR

Incident File

MAR 13 1972

CO:III

DR Central File

Mallinckrodt Chemical Works

Mallinckrodt/Nuclear

ATTN: Mr. Donald W. Soldan, Chief

Radiological Protection Officer

Box 10172, Lambert Field

St. Louis, Missouri 63145

Gentlemen:

This refers to your letter dated February 23, 1972, reporting the exposure of personnel to radioactive material. This matter will be examined during the next inspection of your facilities.

Your letter questions whether exposures based on an employee's exposure to excessive levels of airborne radioactive material are required to be reported when bioassay data indicates that no significant uptake of radioactive material occurred.

While the exposure limits set forth in 10 CFR 20 are expressed in terms of exposure to concentrations of radioactive material in air, averaged over 40 hours in any period of seven consecutive days, the regulations do not prescribe specific methods to be used in demonstrating that the limits are met. Therefore, all relevant information should be evaluated, including the results of urine and fecal analyses, breathing zone air sampling data, thyroid and in vivo counting, personnel and area contamination data, and the individual's work history (i.e., periods of potential exposure, types of operations involved, etc.) to make the best estimate of exposure incurred. Should such an evaluation indicate that an individual has received an exposure to concentrations of airborne radioactive material in excess of Part 20 limits, then the individual and the AEC must be informed in writing of the exposure pursuant to 10 CFR 20.405. If, however, the evaluation indicates that the individual has not received an exposure to concentrations of airborne radioactive material in excess of Part 20 limits, then notification pursuant to 10 CFR 20.405 is not required.

Very truly yours,

Information in this record was deleted  
in accordance with the Freedom of Information  
Act, exemptions 6  
FOIA 96-343

Lawrence D. Low, Director  
Division of Compliance

C/39

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