



THE  
GREENWICH HOSPITAL  
ASSOCIATION

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P-7

May 16, 1987

Mr. Thomas K. Thompson  
Nuclear Materials Section B  
Division of Radiation Safety & Safeguards  
US Nuclear Regulatory Commission  
631 Park Avenue  
King of Prussia, PA 19406

Re: License # 06 09522 02  
Docket # 030 00118  
Control # 105571

Dear Mr. Thompson:

We are in receipt of your letters dated 13 March 1987 and 7 May 1987 in which additional information was requested concerning our source change.

We are sorry for the delay, but the impression we received from the initial reading was that no response was necessary. However, please note the following:

(1) We seem to be hung up between the definition of timer accuracy and source transit error. Please be advised that ANSI procedures or NE CRP procedures are used by our physics staff. Timer accuracy can be measured in one of two methods:

(a) comparison of timer length with a standard reading such as that from a stop watch; or,

(b) measurement of the unit's output over a number of time periods (ie: 1 minute; 2 minute; 4 minute; 6 minute); calculation of the respective dose rate (ie: rad/minute); and, comparison of the variation in dose rates with an acceptable limit being a 2% variation.

(2) With regards to the wording of Title 10 CFR 20, Section 20.105 (b), we are pleased that we meet these requirements and that no further information is required on this subject. However, please note that our physicist still disagrees with your interpretation of wording. Please note the following:

(a) your letter of 13 March 1987, quotes the regulations as "... neither ... nor". This is not correct! The regulation states "... OR ...". WEBSTERS THIRD INTERNATIONAL DICTIONARY defines the word "or" as being "... used as a function word to indicate an alternative between different things, states or actions ..." and "... a choice between alternatives ...". As such, standard English usage of the word "or" indicates a choice between two alternatives. Nowhere is the word "or" defined as an indication of meeting both choices in a phrase. If the NRC wishes to imply "and"; then the regulations should be amended to read "and" and not "or". To impose your own definition to a commonly accepted word is not a proper use of the English language.

With best regards,

*Michael L. Cpario, Jr.*  
Michael L. Cpario, Jr., M.S., CHP<sup>2</sup>  
Certified Health Physicist

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