



UNITED STATES DEPARTMENT OF COMMERCE
National Bureau of Standards
Washington, D.C. 20234

December 6, 1978

Robert Alexander
Occupational Health Standards
Office of Standards Development
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Dear Bob:

Jim Leiss has asked me to send you my comments on what Claire Palmiter has written. He is too busy right now to comment separately.

Sincerely,

A handwritten signature in cursive script, likely reading "M. Ehrlich", is written over the typed name.

M. Ehrlich, Physicist
Radiation Physics Division
Center for Radiation Research

Enclosures

cc: Claire Palmiter

7812280260

A. Regarding the NRC Draft, Proposed Laboratory . . . (C. Palmiter)

Section 2, Scope of Laboratory Functions, starting on page 2:

Eventually, the activities of the testing laboratory may amount to a routine and a special calibration of the participants' personnel dosimeters. However, planning from the outset to make the testing laboratory into a secondary calibration laboratory may not be the most expedient approach. For the sake of avoiding to have NRC rules established but lacking a laboratory that is willing and able to take over the function of a testing laboratory, it would be advisable to drop this idea, for the time being. Also, the statement at the top of page 3 that the processors could then operate without a calibration facility of their own is quite ill-advised.

Starting with Section 3 (page 4) to the end of the document:

The NCR's dilemma is that, on the one hand, it is paying the University of Michigan to produce a complete testing-laboratory manual, while, on the other hand, it needs to go ahead with the staff paper prior to receiving this manual. Copying the BNWL-542 (1967) document is not the right solution. Conceivably, one could refer to this document, saying that the current cost estimate is based on the requirements laid down in it. Then one could make a list of all items involved (land, building, equipment) and base one's cost estimate on the current cost of these items, as was actually done. |

There is one further consideration that speaks against incorporating a complete laboratory manual in the staff paper: If the NRC still plans to recommend a NRC-NBS Interagency Agreement for continuing technical supervision of the testing laboratory (regardless of whether it be a NRC-funded or an independent entity) it is suggested that the details of the testing laboratory's technical operation either be left to the discretion of NBS or be spelled out in the NRC-NBS Agreement. This Agreement need not be considered until after the completion of the Pilot Study.

11-24-78

B. Regarding the Historical Background (C. Palmiter)

Most of the difficulty with this section (misrepresentations, wrong emphases, wrong time sequence of events) could be removed by shortening the section. (Existing brief historical outlines may be obtained from B. Weiss, NRC, and M. Ehrlich, NBS, among others.) However, if a detailed background is required, the attached outline of events that took place in the seventies, as seen from M. Ehrlich's vantage point, might be of help.

November 24, 197

PERSONNEL DOSIMETRY PERFORMANCE,

A BRIEF TIME TABLE OF HISTORICAL DEVELOPMENTS IN THE SEVENTIES,
AS SEEN FROM THE VANTAGE POINT OF M. EHRLICH, NBS.

May 1973. Workshop #3 on Personnel Dosimetry, at the 5th Annual Conference of Radiation Control Program Directors. (Note: The recommendation on page 4, last paragraph, of Palmiter's historical background statement is a Work Shop recommendation; the Federal agencies had a technical backup function, as is usual in the meetings of the Conference and in its Task Forces.)

Summer and Fall, 1973. Guidelines for a personnel-monitoring testing program drafted by NBS under the auspices of the Conference's Task Force on Personnel Dosimetry. (This document formed the basis of the deliberations of the later established HPSSC Work Group, and resulted in the ANSI Draft Standard N13.11.)
February, 1974. BRH started to fund work at NBS toward the development of a workable personnel-dosimetry testing program. (The BRH-NBS Interagency Agreement was then extended in July, 1974, for one year.)

June, 1974. NBS called a meeting of Federal users and processors of personnel-dosimetry services (mostly ERDA contractors), and of NRC and BRH representatives, to discuss the ^{NBS} draft guidelines, and the need for such guidelines, in general. (The reaction was cautious and rather negative on the need for a standard beyond those existing.)

July, 1974. As a result of competitive bidding, NBS awarded a contract to BNW for providing a data base against which to test the performance criteria included in the NBS guidelines. With the aid of contractual funds from NRC, BNW then extended the evaluation phase of this base-line study in 1976, by evaluating the results also by the existing NSF performance standard and by the existing ANSI standard for photographic film dosimeters and the ANSI standard for TL dosimeters, then in the development stage.

August, 1975. HPSSC established a Work Group for the development of standard criteria for personnel-dosimetry performance, under its auspices. (The NBS guideline document served as a starting point for the Group's deliberations.)

December 1976. Joint NRC-BRH-ERDA Open Meeting, to discuss publicly the NRC proposed rule changes, incorporating the then current HPSSC criteria draft.

March, 1977. First meeting of Federal Interagency Policy Committee, established in response to suggestions at the Open Meeting. (Note: This Committee essentially is the formal continuation of a Federal Agency group with representation from EKH, NRC, ERDA (DOE) and NBS, which had been meeting since 1975.)

July, 1978. Publication of N13.11, Draft American National Standard, Criteria for Testing Personnel Dosimetry Performance.