

January 13, 2000

MEMORANDUM TO: Catherine Haney, Acting Chief
Rulemaking and Guidance Branch
Division of Industrial and Medical
Nuclear Safety, NMSS

FROM: Melvyn Leach, Acting Chief
Special Projects Branch
Division of Fuel Cycle Safety
and Safeguards, NMSS

SUBJECT: TICKET NMSS 199900662: APPROVAL OF DRAFT ANSI STANDARD/
N13.49, PERFORMANCE AND DOCUMENTATION OF RADIOLOGICAL
SURVEYS

FCSS staff has reviewed the draft ANSI Standard N13.49 "Performance And Documentation of Radiological Surveys," attached to Ticket 199900662 as requested by the Division of Industrial and Medical Nuclear Safety (IMNS).

The document appears to be well developed and organized, covering most types of radiological surveys that would be encountered over a wide range of workplaces in which radiological materials are used and encountered. It should provide useful information for individuals and organizations looking for a foundation on which to base survey procedures, methods for performing surveys, and selection of instruments.

In the course of this review, two comments on the substance of the report, and one editorial comment, were identified. These are provided in the attachment to this memorandum.

If you have any questions, please contact Dr. Richard Struckmeyer at (301) 415-5477 or me at (301) 415-7853.

Attachment: Comments on draft ANSI
Standard N13.49 - Performance And
Documentation of Radiological Surveys

cc: Anthony Tse, IMNS

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UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

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A handwritten signature in cursive script that reads "Melvyn Leach".

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Comments on draft ANSI Standard N13.49
Performance And Documentation of Radiological Surveys

1. Page 5, lines 203 - 208 and lines 221 - 225. The definitions for critical level (L_c) and detection limit (L_d), while correct, are written in a manner that is of greater technical complexity than most of the standard. The only other noted mention of L_c and L_d in the standard occurs on page 20, lines 634 - 635, where reference is made to other documents. Given that these concepts are not actually used in the standard, there is no apparent reason for the complicated definitions.
2. Page 17, lines 560 - 566. Regarding the selection of radiation sources for calibration of instruments used in assessing residual surface contamination levels, it is noted that attenuation may shift the beta energy distribution to lower energies, and therefore calibration sources should not exceed the unattenuated radiation energy of the contaminants. However, no guidance is provided as to how the worker may determine the energy of the radiation for surfaces contaminated with an unknown radionuclide(s).
3. (Editorial) Page 10, line 350. It appears that a semicolon was used after the word "controlled." This should be a comma.

ATTACHMENT