

Detroit Edison



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**OFFICE OF SECRETARY
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ADJUDICATIONS STAFF**

July 15, 2003
NRC-03-0058

Secretary
U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001
ATTN: Rulemakings and Adjudications Staff

Reference: Petition for Rulemaking
Federal Register Notice (68FR23618),
dated May 5, 2003

Subject: Detroit Edison Comments on Petition for Rulemaking
Filed by Sander C. Perle, PRM-20-25

Detroit Edison, owner and operator of the Fermi 2 Nuclear Power Plant, wishes to comment on the petition for rulemaking filed by Sander C. Perle requesting that the NRC amend its regulations in 10 CFR 20.1003 and 10 CFR 20.1501.

Detroit Edison supports the intent of this petition, which will assure that individuals who are monitored for occupational radiation exposure are monitored with dosimetry that is required to meet applicable quality standards of the National Voluntary Laboratory Accreditation Program (NVLAP) of the National Institute of Standards and Technology. However, we believe that the proposed regulatory wording needs clarification. We have two concerns:

(a) Most nuclear power reactors assign secondary dosimetry, in addition to the primary dosimetry, to individuals who are monitored for occupational radiation exposure. The primary dosimetry provides the dose of record. The secondary dosimetry is used to provide an instantaneous indication of dose rate and accumulated dose. In the event that a person's primary dosimetry is lost or unreadable, the secondary dosimetry is used as part of an investigation to determine dose. The proposed wording could be interpreted as requiring NVLAP accreditation for secondary dosimetry, because of its contingency use to determine dose. Since this is not the intent of this petition for

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rulemaking, the wording should be clarified to avoid the need for NVLAP accreditation of secondary dosimetry.

(b) The proposed wording defines a personal (lapel) air sampler as an "individual monitoring device." This may be interpreted as requiring NVLAP accreditation for lapel samplers, since they may be used to determine Committed Effective Dose Equivalent (CEDE). The wording should be clarified to remove the need for NVLAP accreditation of lapel samplers.

Given the concerns mentioned above, Detroit Edison proposes the following wording for the definition for individual monitoring devices in 10 CFR 20.1003, and Section (c) of 10 CFR 20.1501:

§ 20.1003 Definitions

* * * * *

"Personnel Dosimeter" means a monitoring device designed to be worn by a single individual for the assessment of deep dose equivalent, lens dose equivalent, and/or shallow dose equivalent, and used for the purpose of demonstrating compliance with the applicable Occupational Dose Limits of Subpart C and providing data used to prepare records required by paragraph 20.2106.

"Secondary Personnel Dosimeter" means a monitoring device designed to be worn by a single individual for the purpose of providing an immediate indication of ambient external dose equivalent rate or accumulated dose equivalent, and for assistance in providing a backup assessment of deep dose equivalent, lens dose equivalent, and/or shallow dose equivalent in the event of Personnel Dosimetry failure or loss. A Secondary Personnel Dosimeter is not considered a Personnel Dosimeter if an individual wearing a Secondary Personnel Dosimeter is also wearing a Personnel Dosimeter.

§ 20.1501 General

* * * * *

(c) All Personnel Dosimeters must be processed and/or evaluated by a dosimetry processor --

- (1) Holding current personnel dosimetry accreditation from the National Voluntary Laboratory Accreditation Program (NVLAP) of the National Institute of Standards and Technology; and
- (2) Approved in this accreditation process for the type of radiation or radiations ...[same as existing wording]

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Should you have any questions or require additional information, please contact Mr. Daniel Craine, Supervisor – Radiological Engineering, at (734) 586-1516.

Sincerely,

A handwritten signature in dark ink, appearing to be 'NKP', with a long horizontal flourish extending to the right.

Norman K. Peterson
Manager – Nuclear Licensing

cc: M. A. Ring
J. F. Stang, Jr.
NRC Resident Office
Regional Administrator, Region III
Supervisor, Electric Operators,
Michigan Public Service Commission