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Chief, Rules and Directives Branch
Division of Administrative Services
Office of Administration
U.S. Nuclear Regulatory Commission
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68 FR 43769

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Rules and Directives
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**Subject: Comments on Proposed Generic Communication Method For
Estimating Effective Dose Equivalent From External Radiation
Sources Using Two Dosimeters (68 FR 43769, July 24, 2003)**

Ladies and Gentlemen:

Progress Energy submits the following comments related to the subject Federal Register notice. Our responses to the eight questions posed in the Federal Register are as follows:

1. Is the two dosimeter method a technically acceptable alternative to the current practice of estimating EDE from deep dose equivalent (DDE)?

Answer: Yes, this is a technically acceptable alternate method to the current practice.

2. Is the NRC use of a RIS to approve the two dosimeter method acceptable under the existing regulations?

Answer: Yes, use of the RIS is acceptable.

3. Are algorithms that attempt to provide better estimates of the effective dose equivalent by using more than one dosimeter of importance to your industry?

Answer: No, use of the highest value will likely be more acceptable to American Nuclear Insurers.

4. Do you believe that this and similar algorithms, many of which were described in NCRP Publication 122, are sufficiently technically developed to serve as a basis for dosimetry of record?

Answer: Yes. The question though is whether the cost and effort of multibadging is worth what will probably be a relatively small lowering of official dose.

Template = ADM-013

E-RIDS = ADM-03
Ack = C. Petrone (ADP)
R. Pedersen (RIPs) S. Sherbin (SXS2)

5. Is the discussion of the issues provided in the RIS sufficiently detailed to provide a background for the reasons for approving the EPRI method generically?

Answer: Yes we believe so.

6. Should different or more detailed guidance be provided in an NRC Regulatory Guide or generic communication?

Answer: No.

7. Should the definition of the total effective dose equivalent (TEDE) in part 20 be revised to replace the deep dose equivalent with the effective dose equivalent, and make that quantity more consistent with national and international definitions?

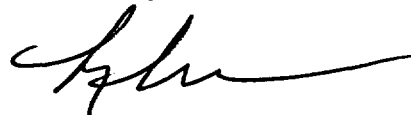
Answer: Yes, but the definition needs to be stated such that the effective dose can be estimated by the highest DDE calculated or recorded in lieu of multiple badge effective dose calculations.

8. To what extent should accuracy replace conservatism as the goal for personnel monitoring?

Answer: Conservative methods (e.g. use of the highest DDE, calculated values, use of single dosimeter) for estimating the DDE should be allowed for all exposures less than the regulatory requirements.

Progress Energy appreciates the opportunity to provide these comments. Please contact me at (919) 546-4579 if you have any questions.

Sincerely,



Tony Groblewski
Supervisor - Corporate
Regulatory Affairs

DSL