



Dominion

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Rules and Directives Branch

Office of Administration
U. S. Nuclear Regulatory Commission
Mail Stop T6-D59
Washington, D.C. 20555-0001

Serial No. GL03-034

Attention: Chief, Rules and Directives Branch, Division of Administrative Services

COMMENTS ON NOTICE OF PROPOSED RULEMAKING FOR GENERIC COMMUNICATION METHOD FOR ESTIMATING EFFECTIVE DOSE EQUIVALENT FROM EXTERNAL RADIATION SOURCES USING TWO DOSIMETERS (FEDERAL REGISTER, VOLUME 68, NUMBER 142, PAGES 43769-43771, DATED JULY 24, 2003)

Virginia Electric and Power Company (Dominion) and Dominion Nuclear Connecticut, Inc. (DNC) appreciate the opportunity to provide comments on the proposed generic communication method for estimating effective dose equivalent from external radiation sources using two dosimeters, as described in the subject *Federal Register* notice.

Dominion supports the NRC proposal to issue a Regulatory Issue Summary (RIS) which provides guidance on an approved two dosimeter monitoring method that can be used by licensees for estimating effective dose equivalent (EDE) from external radiation exposures.

The following comments are provided in response to the questions presented in the *Federal Register* notice:

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

Dominion believes the NRC's exemption to Entergy approving the use of a two dosimeter method for estimating EDE based on the technical work performed by the Electric Power Research Institute (EPRI), in conjunction with recommendations in National Council on Radiation Protection and Measurements (NCRP) Report No. 122, support the two dosimeter methodology as proposed in the RIS.

E-RIDS = ADM-03

Add - A. Petrone (ADP)
S. Sherbini (SKS2)
R. Pedersen (RIP1)

Template = ADM-013

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

Dominion believes that use of a RIS is acceptable on an interim basis. However, we believe that 10 CFR Part 20 should be revised to provide additional clarification (See comment to Question 7).

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?

Yes. Dominion supports efforts to provide better estimates of EDE.

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?

Yes (See comment to Question 1).

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?

Yes.

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

The RIS is sufficient.

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?

Dominion believes that part 20 should be revised to allow the evaluation of TEDE using either deep dose equivalent or effective dose equivalent as determined by the licensee.

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

To the extent practicable, Dominion believes that accuracy should replace conservatism as the goal. On occasion epidemiological studies are performed to evaluate the impacts of radiation exposure to exposed populations. Accuracy of exposures could impact study results.

If you would like further information, please contact either:

Lee Thomasson Lee_Thomasson@dom.com or (804) 273-3066

Don Olson Don_Olson@dom.com or (804) 273-2830

Sincerely,

A handwritten signature in black ink, appearing to read "CF", with a stylized flourish extending to the right.

Chris L. Funderburk, Director
Nuclear Licensing and Operations Support