

# PUBLIC SUBMISSION

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**Docket:** NRC-2012-0133

NRC Form 5, "Occupational Dose Record for a Monitoring Period"

**Comment On:** NRC-2012-0133-0001

NRC Form 5, Occupational Dose Record for a Monitoring Period

**Document:** NRC-2012-0133-DRAFT-0002

Comment on FR Doc # 2012-14872

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## General Comment

•Layout of the proposed draft layout of NRC Form 5  
 No issues with the proposed layout of the new form.

•Estimated economic costs associated with modifying information technology (IT) systems to include EDEX field.

A total upgrade to the exposure tracking software would be required. The current version does not support this form and EDEX field. The estimated cost would be approximately \$50,000.

•Estimated DOSE SAVINGS (not economic savings as incorrectly annotated in the Federal Register Notice – clarification received from NRC) associated with calculating EDEX for certain occupational employees.

EDEX has limited application but has the potential for significant dose savings with certain types of work; otherwise VCSNS does not expect much impact on dose savings from normal operations or refueling outages.

•Clarity of the instructions provided for completing the proposed draft NRC Form 5, specifically concerning the use of EDEX and new directions for blocks 11A and 11B.

The instructions for block 11a where it states “ and the EDEX component estimated by the DDE...” needs clarification. The term “estimated” lends to confusion because of its application in Block 9A. Including examples for blocks 11A and 11B in a separate guide could be beneficial.

•Other options, information or considerations.

Standard training and communication materials for all radiological workers and more detailed training with examples for radiation protection personnel would be beneficial.

SUNSI Review Complete

Template = ADM-013

E-RIDS = ADM-03

Add = D. Lewis (OELI)

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