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SUBJECT: Requests NRC approval to continue using Reg Guide 8.38,
 Section 2.4 as alternate method to meet requirements of
 10CFR20.1601 as discussed. D

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DUKE POWER

October 28, 1993

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555

Subject: Oconee Nuclear Station
Request for Approval of Alternate Method
to Meet Requirements of 10 CFR 20.1601

Gentlemen:

Oconee Nuclear Station revised its practice of locking high radiation area doors in March, 1993. Oconee unlocked the doors and began using digital alarming dosimeters, along with radiation work permits, to allow authorized individuals access into high radiation areas. This is a practice used throughout the industry, and is recognized by the NRC as an acceptable method of meeting 10 CFR 20.1601.

Regulatory Guide 8.38, Part C, Section 2.4 was interpreted as stating that the alternate method listed in this section was approved by the NRC and recognized as an acceptable means of meeting 10 CFR 20.1601(a).

During a recent inspection, Oconee learned that its interpretation of the Regulatory Guide was inconsistent with that of the NRC. The NRC's interpretation is that, although Section 2.4 lists an acceptable alternative for complying with 10 CFR 20.1601(a), permission must be granted by the NRC prior to unlocking high radiation area doors and implementing this alternate method.

We therefore respectfully request NRC approval to continue using the alternate method discussed above.

Very truly yours,

J. W. Hampton

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Document Control Desk
October 28, 1993
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