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NUCLEAR GENERATION DIVISION

July 24, 2012

Ms. Cindy K. Bladey
Chief, Rules, Announcements and Directives Branch (RADB)
Office of Administration
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Docket ID NRC-2012-0133, Industry Comments on NRC Form 5, Occupational Dose Record for a Monitoring Period

Project Number: 689

Dear Ms. Bladey:

On June 19, 2012, the U.S. Nuclear Regulatory Commission (NRC) issued a *Federal Register* Notice (77 FR 36583) soliciting public comment on the draft NRC Form 5 Occupational Dose Record for a Monitoring Period as required by Title 10 *Code of Federal Regulations* Part 20 (10 CFR Part 20 2206(b)). This regulation specifies categories of licensees that must annually report occupational radiation dose information contained in NRC Form 5.

While the Nuclear Energy Institute (NEI)¹ concurs that the current NRC Form 5 should be modified to align with existing regulations, there are several NRC licensees, including fuel cycle facilities and some power reactors, who do not use nor plan to use "Effective Dose Equivalent for External Exposures (EDEX)." If required to make the proposed changes to Form 5, these facilities would be required to expend resources with little or no benefit. An alternative approach would be an option for the use of two separate forms – one form containing information for licensees that choose to use EDEX (i.e. the proposed revision to Form 5) and another form for those facilities that choose not to use the EDEX methodology (i.e. the current Form 5). With this approach, only those licensees that choose to use EDEX would be required to expend the resources necessary to revise their software, etc. so as to comply with the proposed revision to Form 5..

¹ NEI is the organization responsible for establishing unified nuclear industry policy on matters affecting the nuclear energy industry, including the regulatory aspects of generic operational and technical issues. NEI's members include all utilities licensed to operate commercial nuclear power plants in the United States, nuclear plant designers, major architect/engineering firms, fuel fabrication facilities, materials licensees, and other organizations and individuals involved in the nuclear energy industry.

SUNSI Review Complete

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In addition to the previous generic comment, the enclosed specific comments and information requested by NRC are being submitted on behalf of the nuclear energy industry.

We thank you for the opportunity to comment on the document, and we look forward to further discussions with you concerning this issue. If you have any questions concerning these comments, please contact me at 202-739-8043; exa@nei.org.

Sincerely,

A handwritten signature in cursive script that reads "Ellen P. Anderson". The signature is written in black ink and is positioned above the printed name.

Ellen P. Anderson

Enclosure

ENCLOSURE

Industry Comments to Form 5

NRC Issue/Questions	Comments
Layout	Industry has no concerns about the proposed layout of the revised Form 5.
Estimated economic costs associated with modifying information technology (IT) systems to include an EDEX field	The costs associated with the IT changes vary from site-to-site, depending on the computer system used by the specific plant or company fleet. Feedback from the various plants indicates a range of costs from \$10K to \$500K per plant site.
Estimated dose savings associated with calculating EDEX for certain occupational employees	EDEX provides a more accurate assessment of true dose received and is not a dose saving methodology. EDEX is dependent on job specific situations and has limited application. Stations using extensive multi-badging for specific high dose jobs report dose reduction in the range of 15-50% for a single individual. Overall reduction in total exposure for a site will not exceed 5%. Some plants have not and are not planning to use EDEX due to implementation issues such as software changes, administrative burden for implementation, and some regional regulatory scrutiny with implementation.
Clarity of the instructions provided for completing the proposed draft Form 5, specifically concerning the use of EDEX and new directions for blocks IIa and IIb	(1) Instructions for box 19 (Comments) says to "note here if EDEX was calculated for any portion of the monitoring period." Why do we need to note this statement? If boxes IIa and IIb display different values, isn't it obvious that EDEX was calculated? (2) Suggest that a note be added in the Form 5 instructions to state that the value in block IIA should be less than or equal to the value in block IB .
Other options, information or considerations	None