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SUBJECT: Comment supporting draft RG DG-8014 (proposed rev 3 to
 RG 8.13, "Instruction Concerning Prenatal Radiation
 Exposure").

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Regulatory Publications Branch, DFIPS
Office of Administration
U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Contact: Bill Morris

Reference: Draft Regulatory Guide DG-8014, October, 1994

Dear Sirs:

Subject: Palo Verde Nuclear Generating Station (PVNGS)
Units 1, 2, and 3
Docket Nos. STN 50-528/529/530
Comments to Draft Regulatory Guide DG-8014
File: 95-005-419.06

Arizona Public Service Company (APS) on behalf of itself and participants for the Palo Verde Nuclear Generating Station (PVNGS) submits the enclosed comments to the draft Regulatory Guide DG-8014 (proposed revision 3 to Regulatory Guide 8.13, "Instruction Concerning Prenatal Radiation Exposure"). The comments are provided by the PVNGS Radiation Protection Technical Services Department which are specific to Questions and Answers (Q&A) #9 and #13. We appreciate the opportunity to comment on the proposed revision to regulatory guide 8.13 and the Staff's consideration of our comments.

As requested, a copy of this letter and the enclosure are being sent to the Regional Administrator, Region IV.

If you require additional information or wish to discuss the comments, please contact Mr. Tom Gray at (602) 393-5004.

Sincerely,

Bill Morris for AKK

AKK/RJH/pv

Enclosure

cc: L. J. Callan

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ENCLOSURE

**COMMENTS ON DRAFT REGULATORY GUIDE DG-8014
INSTRUCTION CONCERNING PRENATAL EXPOSURE**

COMMENTS ON DRAFT REGULATORY GUIDE DG-8014 INSTRUCTION CONCERNING PRENATAL EXPOSURE

PROPOSAL ON HOW TO DECLARE PREGNANCY

Question #9

What information must I provide in my declaration of pregnancy?

APS COMMENT: Most employers have taken the time and effort to develop a comprehensive program including procedures and forms for declaration of pregnancy. It is recommended that the individual be given the option to use a declaration of pregnancy form developed by the employer in addition to the form listed in the regulatory guide. If the employer does not have a form, the sample in the regulatory guide should be used. This would ensure consistency in reporting the necessary information for the declaring individual, the employer and the NRC.

Question #13

If I am planning to become pregnant but am not yet pregnant, and I inform my employer of that in writing, do the lower dose limits apply?

APS COMMENT: The answer in the draft regulatory guide states, "No, the lower limit applies only if you declare you are already pregnant." PVNGS, as well as other utilities, have established programs where a female attempting to become pregnant may apply for temporary administrative exposure limits similar to the dose limits of a declared pregnant women. We are requesting that a contingency be added to allow acceptance of established special programs, offered by the licensee, to protect females attempting to become pregnant.

