

January 9, 1984

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	
)	
)	
)	
CAROLINA POWER & LIGHT COMPANY)	Docket Nos. 50-400 OL
and NORTH CAROLINA EASTERN)	50-401 OL
MUNICIPAL POWER AGENCY)	
)	
(Shearon Harris Nuclear Power)	
Plant, Units 1 and 2))	

APPLICANTS' STATEMENT OF MATERIAL FACTS
AS TO WHICH THERE IS NO GENUINE ISSUE TO BE
HEARD ON JOINT CONTENTION IV

Pursuant to 10 C.F.R. § 2.749(a), Applicants state, in support of their Motion for Summary Disposition of Joint Contention IV in this proceeding, that there is no genuine issue to be heard with respect to the following material facts:

1. Joint Contention IV alleges that Applicants intend to rely on thermoluminescent dosimeters (TLDs) as the dosimeter of record to monitor occupational radiation exposure, that because of TLD inaccuracies and inability to provide real-time monitoring, TLDs are inadequate to assure worker health and safety, and that Applicants should be required to use portable pressurized ionization monitors to corroborate TLD readings.
2. Applicants intend to use TLDs manufactured by Panasonic Company as the official dosimeter of record. Affidavit of Stephen A. Browne (hereinafter "Browne Affidavit") at 3, 9.

3. TLDs will be worn continuously by individuals working in the radiologically controlled areas of the Shearon Harris Nuclear Power Plant (SHNPP). Browne Affidavit at 4.

4. The TLDs selected for use at SHNPP have been tested and found to meet the performance specifications of ANSI N13.11-1983 for photons and betas. Browne Affidavit at 9.

5. Applicants intend to use Self Reading Pocket Dosimeters (SRPDs) to monitor workers in areas where significant radiation exposure is possible. Browne Affidavit at 5.

6. SRPDs provide real-time monitoring capability in that they measure integrated dose and can be read by a worker at any time. Browne Affidavit at 13.

7. Applicants maintain a computer-based dosimetry record keeping system in which complete dose history data is maintained for every individual who must be monitored. Browne Affidavit at 7.

8. Applicants' program of personnel dosimetry, utilizing both TLDs and SRPDs, provides sufficiently accurate and timely radiation dose monitoring to ensure worker safety and health. Browne Affidavit at 2.

9. Portable pressurized ionization monitors cannot be worn or carried at all times by individual workers. Browne Affidavit at 14.

10. Fixed-position portable pressurized ionization monitors cannot account for spatial variations in the exposure

rate within a work area, the movement of a worker within a work area, the variation of a radiation field as a function of time or the variable time spent by a worker in a radiation field. Browne Affidavit at 14-15.

11. Portable pressurized ionization monitors do not have real-time monitoring capability because they do not measure integrated dose. Browne Affidavit at 16.

Respectfully submitted,

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Dated: January 9, 1984

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CERTIFICATE OF SERVICE

I hereby certify that copies of the documents listed on the attached Document List were served this ninth day of January, 1984, by deposit in the U.S. mail, first class, postage prepaid, to the parties on the attached Service List.

Pamela H. Anderson

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DOCUMENT LIST

1. Applicants' Motion For Summary Disposition Of Joint
Intervenors' Contention IV (Thermoluminescent Dosimeters)
2. Applicants' Statement Of Material Facts As To Which
There Is No Genuine Issue To Be Heard On Joint Contention IV
3. Affidavit Of Stephen A. Browne

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