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Bill M. Morris
56 FR 58256
11/18/91

BOOKETED USNRC
REGULATORY PUBLICATIONS BR

Florida
Power
REGULATION

'91 DEC 23 P1:37

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December 19, 1991
NS91-0367

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

Dear Sir:

We have performed a technical review of the following draft Regulatory Guides and NUREG's. Our comments are enclosed.

DG-8003, Proposed Rev. 1 to Regulatory Guide 8.25,
"Air Sampling in the Workplace"

DG-8004, "Radiation Protection Programs for
Nuclear Power Plants"

DG-8005, "Assessing External Radiation Dose From
Airborne Radioactive Materials"

DG-8006, "Control of Access to High and Very
High Radiation Areas in Nuclear Power Plants"

NUREG-1400, "Air Sampling in the Workplace"

NUREG/CR-0006, "DEPOSITION: Software to Calculate Particle
Penetration Through Aerosol Transport Lines"

If you have any questions, please contact Mr. Steven M. Garry, Corporate
Health Physicist, at 904/795-6486, extension 4625.

Sincerely,

Sam Board, Jr.

P. M. Board, Jr.
Senior Vice President
Nuclear Operations

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Enclosure. 6

COMMENT FORM

DOCUMENT REVIEWED: Draft Regulatory Guide DG-8005, "Assessing External Radiation Dose From Airborne Radioactive Materials"

REVIEWERS: Steven M. Garry
Ron J. Browning

COMPANY: Florida Power Corporation

General Comments

1. This Regulatory Guide provides minimal new information to the nuclear industry and would probably be best combined with some other Regulatory Guide.

FPC COMMENTS ON DRAFT REGULATORY GUIDE DG-8005

No.	Page	Sect/Para/ Line	Comment and Justification	Proposed Rewording
1	2	A/	The method of prospectively using $1E-7$ uCi/ml is mentioned, but not explained.	
2	2	B/2,3,4	External exposure from cloudshine and submersion produce radiation exposure to both shallow and deep dose. The exposure pathway of eye exposure/dose from cloudshine and submersion should be added to the list.	Delete the words "deep dose and shallow dose." Add: 4) Eye exposure from cloudshine and submersion.
3	3	C/1/1	The deep dose from noble gas is measured properly by personnel dosimeters, and only the soft beta - shallow dose needs to be measured by other methods.	In the first sentence, qualify the exception with "... except for the beta shallow dose components of noble gas not measured by dosimetry systems. The shallow dose should be determined by measuring airborne concentrations, and by calculating the shallow dose."
4	3	C/2	This is a statement of the obvious and, therefore, is unnecessary.	Delete this paragraph.

FPC COMMENTS ON DRAFT REGULATORY GUIDE DG-8005

No.	Page	Sect/Para/ Line	Comment and Justification	Proposed Rewording
5	5	No. 2	The evaluation of dosimetry systems has been performed by the manufacturer and documented with extensive literature. In addition, dosimetry systems in use are already meeting NVLAP criteria.	Replace the first sentence with, "The radiation types and energies encountered should be determined, and dosimetry systems should be adjusted to account for this energy distribution; i.e., beta energy correction factors should be established for the beta energies encountered."
6	5	No. 3	The use of $1E-7$ uCi/ml should be explained.	
7	5	No. 4	It is implied in this first sentence that measurements of noble gas concentrations should be used to estimate deep dose equivalents.	Clarify the sentence to say "... except for the beta shallow dose components not measured by dosimetry systems."