



**CENTERIOR  
ENERGY**

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57FR7942

3/6/92

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(7)

Docket Number 50-346

License Number NPF-3

Serial Number 2034

April 27, 1992

United States Nuclear Regulatory Commission  
Regulatory Publications Branch, DFIPS  
Washington, D.C. 20555

Subject: Comments On Draft Regulatory Guides DG-8010 and DG-8011

Gentlemen:

The comments included in this letter are submitted by Toledo Edison in response to the request of the U.S. Nuclear Regulatory Commission (NRC) for comments on Draft Regulatory Guide DG-8010, Criteria for Monitoring and Methods for Summation of Internal and External Occupational Doses and Draft Regulatory Guide DG-8011, Radiation Dose to the Embryo/fetus. These Draft Regulatory Guides are intended to assist in implementation of the requirements of the revision to 10 CFR Part 20, "Standards for Protection Against Radiation," that was published in the Federal Register (56 FR 23360) on May 21, 1991.

Toledo Edison, a subsidiary of Centerior Energy, is partial owner of and is responsible for operation of the Davis-Besse Nuclear Power Station. Toledo Edison has been authorized for power operation of the Davis-Besse Nuclear Power Station since April 1977. As a 10 CFR 50 licensee, Toledo Edison has a vested interest in any policies the NRC may adopt which can affect the management and operation of a commercial nuclear power plant.

Based on a review of Draft Regulatory Guides DG-8010 and DG-8011, the Company finds these documents acceptable as written.

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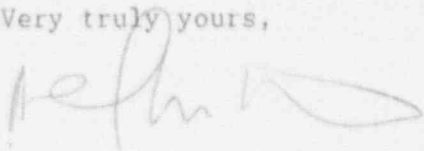
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Operating Companies  
Cleveland Electric Illuminating  
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Please refer any questions regarding these comments to  
Mr. R. W. Schrauder at (419) 249-2366.

Very truly yours,



MAT/dlm

cc: A. B. Davis, Regional Administrator, NRC Region III  
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