

# YANKEE ATOMIC ELECTRIC COMPANY

Telephone (508) 779-6711  
TWX 710-380-7619



580 Main Street, Bolton, Massachusetts 01740-1398

*Handwritten:*  
#457  
PDR  
AC 21

October 24, 1991  
FYC 009-91  
SPS 113-91

Mr. Samuel J. Chilk  
Secretary of the Commission  
United States Nuclear Regulatory Commission  
Washington, DC 20555

Attention: Docketing and Service Branch

Subject: Standards for Protection Against Radiation, 10CFR Part 20  
(56FR23360)

Dear Mr. Chilk:

The purpose of this letter is to request a delay in the implementation date for the revised 10CFR20 (56FR23360) from January 1, 1993 to January 1, 1994. Yankee owns and operates a nuclear power plant in Rowe, Massachusetts. Our Nuclear Services Division also provides services to other nuclear power plants in the Northeast, including Vermont Yankee, Maine Yankee, and Seabrook. As described below, delay of the implementation date will allow Yankee to complete detailed procedures consistent with NRC guidance.

The revised Part 20 involves new concepts and fundamental changes in all areas of radiation protection programs including: procedures, record keeping, respiratory protection, ALARA, computer updating, and training. These changes can best be implemented with the interpretive regulatory guidance. This had been expected to be available in final form by the end of 1991. To date only a few of the regulatory guides have been published in draft form and it is clear that the 1991 date for issuance will not be met. The absence of this guidance places the ability of licensees to implement the revised rule by the intended 1 January 1993 date in serious question. The current plan for implementation of all changes necessary for full compliance with the new radiation program within the Yankee companies, were it to begin now based on assumptions about content of the guidance, indicates completion of the final training and adjustments well past the 1 January 1993 implementation date. Accordingly, a one year extension for implementation appears prudent and necessary to ensure proper implementation of the revised Part 20 rule.

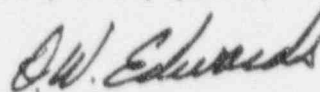
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PDR PR  
19 57FR38588 PDR

October 24, 1991

Further, under the new rule, the agreement states already have until 1994 to implement 10CFR20. Because of this difference in implementation dates between agreement states and licensees, there is a potential for the chaotic situation of two very different regulations to be in effect simultaneously. That is, the agreement states could be using the current regulations at the same time the utilities and fuel fabrication facilities are using the revised regulations. This mismatch would be particularly evident with transient health physics and outage workers since major differences will exist in the area of exposure control and exposure tracking.

Based on the foregoing, it is requested that the Commission take the earliest possible action to postpone the implementation date for the revised 10CFR Part 20 rule to January 1, 1994.

Very truly yours,



Donald W. Edwards  
Director, Industry Affairs

DWE/dhm/C76\55

19 & 20  
(57 FR 21216)



**KERR-MCGEE CORPORATION**

KERR-MCGEE CENTER • OKLAHOMA CITY, OKLAHOMA 73125

① PDR  
AE21-2  
①

CREATED  
USNRC

'92 JUN -8 P12:25

ENVIRONMENT AND HEALTH MANAGEMENT DIVISION

EDWIN T. STILL, DVM  
VICE PRESIDENT AND DIRECTOR

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

June 2, 1992

Secretary  
U. S. Nuclear Regulatory Commission  
Attention: Docketing and Service Branch  
Washington, D.C. 20555

Re: 10 CFR Parts 19 and 20, Standards for Protection Against  
Radiation (57 FR 21216, May 19, 1992)

Dear Mr. Secretary:

Kerr-McGee Corporation is a licensee of both the Nuclear Regulatory Commission and various Agreement States. The company is thus directly subject to the proposed rule about extending the implementation date for the Commission's revised standards for protection against radiation, as announced in the referenced Federal Register Notice.

Kerr-McGee ~~endorses~~ the extension of the implementation date as proposed. The revised standards contain many significant changes for which regulatory guidance is essential for licensees. The extension hopefully will enable the Commission to issue adequate guidance.

Sincerely,

*Edwin T. Still*

ETS:lld

9206250127



19220 PDR  
(57 FR 21216)

DOCKETED  
USNRC

WASHINGTON PUBLIC POWER SUPPLY SYSTEM

P.O. Box 968 \* 3000 George Washington Way \* Richland, Washington 99352

'92 JUN -8 P12:24

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

June 4, 1992  
GO2-92-136

Docket No. 50-397

Secretary, U.S. Nuclear Regulatory Commission  
Attn: Docketing and Service Branch  
Washington, D.C. 20555

Gentlemen:

Subject: **WNP-2 OPERATING LICENSE NPF-21,  
RESPONSE TO PROPOSED RULE - STANDARDS FOR PROTECTION  
REQUIRED RADIATION; EXTENSION OF IMPLEMENTATION DATE**

On Tuesday, May 19, 1992 the Nuclear Regulatory Commission published (57FR21216) the subject proposed rule. The proposed rule would extend the date by which licensees are required to implement the revised standards for protection against radiation to January 1, 1994.

The Washington Public Power Supply System (Supply System), an U.S. Nuclear Regulatory Commission (NRC) licensee, has reviewed the subject document and ~~concurs~~ with the recommendation. The proposed rule would provide NRC licensees additional time to review and implement the regulatory guidance being developed to implement the rules. Additionally, the proposal would establish a uniform implementation date for NRC licensees and Agreement State licensees.

Our agreement with the proposed rule is based on an understanding that regulatory guidance currently being developed will be issued prior to the end of 1992. Should these schedules slip, the NRC should consider the need to further delay the implementation date for the rule.

9206250107



Secretary, U.S. Nuclear Regulatory Commission

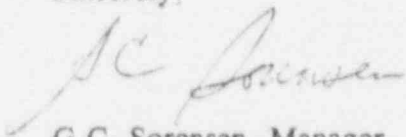
Page 2

June 4, 1992

**RESPONSE TO PROPOSED RULE - STANDARDS FOR PROTECTION  
REQUIRED RADIATION; EXTENSION OF IMPLEMENTATION DATE**

We have also reviewed comments being submitted on this proposed rule by the Nuclear Management and Resources Council (NUMARC) and support those comments as reflecting our own views.

Sincerely,

A handwritten signature in cursive script, appearing to read "G.C. Sorensen", written in dark ink.

G.C. Sorensen, Manager  
Regulatory Programs (Mail Drop 280)

GCS:sn

cc: NUMARC  
NS Reynolds, Winston & Strawn



DOCKET NUMBER  
PROPOSED RULE **PR 19220**  
(57FR21216)

③ PDR  
AE 21-2  
③

E.I. DU PONT DE NEMOURS & CO. (INC.)  
MEDICAL PRODUCTS DEPARTMENT

DOCKETED  
USNRC

June 1, 1992 JUN 11 P4:16

Samuel J. Chilk  
Secretary of the Commission  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

Attention: Docketing and Service Branch.

Subject: Federal Register/Vol 57, No. 97/ Tuesday,  
May 19, 1992 Standards for Protection Against  
Radiation; Extension of Implementation Date.

These comments on the above referenced subject are submitted on behalf of the Medical Product/Imaging Systems Department, NEN Products, E.I. DuPont de Nemours and Company and the DuPont-Merck Pharmaceutical Company.

DuPont, NEN Products is a major supplier of radioactive materials for biomedical and industrial research applications. DuPont Merck Pharmaceuticals Company is a major manufacturer of radiopharmaceuticals for nuclear medicine applications.

We agree with the decision to delay implementation of the revised 10 CFR 20 to 1/1/94. We recommend that the implementation date for NRC licensees and Agreement State Licenses ~~should be concurrent~~ since this will greatly simplify regulatory compliance for manufacturers who widely distribute by-product material to licensees in different states.

If instead the USNRC decides to revert to the previously proposed implementation date of 1/1/93 we urge that licensees be promptly informed as many will have difficulty in complying in time.

We thank you for the opportunity to comment.

Yours sincerely,

Leonard R. Smith  
Radiation Protection Consultant

9206250100

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DOCKET NUMBER  
PROPOSED RULE PR 1-9 & 20  
(57 FR 21216)



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USNRC

④ PDR  
AE21-2  
④

Westinghouse  
Electric Corporation

Energy Systems

'92 JUN 11 04:16  
Box 355  
Pittsburgh, Pennsylvania 15230-0355

OFFICE OF SECRETARY  
LOCKETED E&RS 92-62  
BRANCH

June 8, 1992

Secretary  
U. S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Westinghouse Electric Corporation appreciates this opportunity to provide comments on your proposal that would extend the date by which NRC licensees are required to implement the new revised Part 20. Westinghouse ~~concurs~~ with the Commission's decision to extend the mandatory implementation date to January 1, 1994. This extension will provide licensees with additional time to interface revised radiological programs into their operational facilities in an efficient manner. It will also establish a single date for Agreement State licensees to be in compliance with new Part 20. This is a meaningful change since Westinghouse facilities are licensed by both the NRC and Agreement States.

Current protective programs in effect provide adequate safeguards for worker's safety. This extension until January 1, 1994 will not result in risks to the public or worker. If you have any questions regarding these comments, please contact Mr. A. J. Nardi, License Administrator on 412/374-4652.

Sincerely,

*A T Sabo*

A. T. Sabo, Director  
Environmental & Regulatory Services

dh

9206250087-13



(57 FR 21216)

UNITED  
STATES  
NRC



Northern States Power Company

414 Nicollet Mall  
Minneapolis, Minnesota 55401-1927  
Telephone (612) 330-5500

'92 JUN 15 A11:02

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

June 9, 1992

Secretary  
U S Nuclear Regulatory Commission  
Washington, DC 20555

Attention: Docketing and Servicing Branch

Comments on 10 CFR Part 20 Implementation Date Extension

This letter provides our comments on the proposed rule to extend the implementation date of the revised 10 CFR Part 20, Standards for Protection Against Radiation, in response to the Federal Register notice of May 19, 1992, (57 Fed. Reg. 21216).

We ~~support~~ adoption of the proposed rule by the NRC to extend the implementation date to January 1, 1994. We believe that this extension will allow a more deliberate and effective implementation for the NSP Health Physics Programs (Monticello and Prairie Island nuclear generating plants). There exists a need for our health physics personnel to review the regulatory guides currently being developed by the NRC to clarify key parts of the revised rule. Without this clarification, it will be difficult to effect the necessary procedure changes and employee training required prior to implementation.

We appreciate the opportunity to provide our comments on this very important issue. If you have any questions regarding our comments, please contact Fred Fey or Travis Beard at 612-337-2011.

Thomas M. Parker  
Manager  
Nuclear Support Services

9206250079

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c: Regional Administrator Region III, NRC  
Monticello Senior Resident Inspector, NRC  
Prairie Island Senior Resident Inspector, NRC  
NRR Project Manager, NRC  
J E Silberg



19+20  
(57 FR 21216)

PDR  
AEJ-3  
(6)

NIAGARA MOHAWK POWER CORPORATION/NINE MILE POINT, P.O. BOX 63, LYCOMING, NY 13093-0063 PHONE (315) 349-2882

B. Ralph Sylvia  
Executive Vice President  
Nuclear

'92 JUN 16 P2:58

June 11, 1992

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OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

Secretary  
United States Nuclear Regulatory Commission  
Washington, DC 20555

ATTENTION: Docketing and Servicing Branch

SUBJECT: Comments on Proposed Rule to Extend Implementation  
of the New 10CFR20

Dear Sir:

This letter provides the Niagara Mohawk Power Corporation comments on the proposed rule to extend the implementation date of the revised 10CFR Part 20, "Standards of Protection Against Radiation," as noted in the Federal Register of May 1992 (57 Fed. Reg. 21216).

Niagara Mohawk ~~supports~~ adoption of the proposed rule by the NRC. We believe that changing the required implementation date to January 1, 1994 will result in a more effective and efficient implementation of the revised Part 20. The proposed date provides the necessary time for all licensees to review the new and revised regulatory guides to clarify key points of the revised Part 20. The proposed date change will also allow for more ~~consistency~~ between NRC licensed facilities and those of Agreement States than would have resulted with the existing one year difference in implementation dates. The proposed extension will allow the Nine Mile Point Nuclear Station (and other licensees) to better allocate resources to implement the new requirements, while maintaining current functions to protect public and worker safety.

Our support for the January 1, 1994 implementation date is based on the current status of supporting regulatory activities. It is our understanding that all regulatory guides will be issued prior to the end of this year. Further, additional guidance regarding the preparation and submittal of proposed operating license amendments needed to implement the revised Part 20 will be issued within the next few months. Any delays in these actions would diminish the advantages outlined above.

We believe that current radiation protection programs at nuclear power plants adequately protect public and worker health and safety. It would be imprudent to rush the schedule after all the years it has taken to develop the revised Part 20, especially since significant additional protection will not be achieved by earlier implementation. We support the NRC

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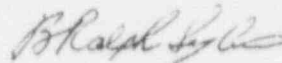
United States Nuclear Regulatory Commission

June 11, 1992

proposal to adjust the implementation date and encourage continued initiatives by the NRC toward successful implementation.

We appreciate the opportunity to provide our comments on this very important issue.

Sincerely,



B. Ralph Sylvia  
Exec. Vice President - Nuclear

BRS/ECG/lmc

xc: S. W. Wilczek, Jr., VP Nuclear Support, NMPC  
D. K. Greene, Manager Licensing, NMPC  
W. L. Schmidt, Senior Resident Inspector, USNRC  
R. L. Anderson, NUMARC





(57 FR 21216)

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19820  
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DOCKETED  
USNRC

NUCLEAR MANAGEMENT AND RESOURCES COUNCIL

1776 Eye Street, N.W. • Suite 300 • Washington, DC 20006-2496  
(202) 872-1280

'92 JUN 17 P5:54

Thomas E. Tilton  
Vice President & Director  
Operations, Management and  
Support Services Division

June 17, 1992

FRICE BY SECRETARY  
DOCKETING UNIT  
BRANCH

Mr. Samuel J. Chilk  
Secretary of the Commission  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Attention: Docketing and Servicing Branch

RE: Standards for Protection Against Radiation;  
Extension of Implementation Date  
57 Fed. Reg. 21216 (May 19, 1992)  
Request for Comments

Dear Mr. Chilk:

This letter provides the Nuclear Management and Resources Council, Inc., (NUMARC)<sup>1</sup> comments on the proposed rule to extend the implementation date of the revised 10 CFR Part 20, "Standards for Protection Against Radiation," in response to the Federal Register notice of May 19, 1992, (57 Fed. Reg. 21216).

We ~~support~~ adoption of the proposed rule by the NRC. As discussed in our previous correspondence to the NRC on this subject, dated October 16, 1991, we believe that changing the required implementation date to January 1, 1994, will better support correct, effective, and efficient implementation of the revised Part 20. It will provide adequate time for licensees to examine the new and revised regulatory guides that are still being developed to clarify key concepts of the revised Part 20 and also to develop or revise regulation compliance capability based on this guidance. The change in the effective date also will aid in the development and implementation of revised programs in a ~~more coherent manner~~ than would have resulted with the existing one year difference in implementation dates for NRC and Agreement State licensees. The proposed extension will also allow licensees and the NRC to better allocate manpower and monetary resources to implementing the new

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<sup>1</sup>NUMARC is the organization of the nuclear power industry that is responsible for coordinating the combined efforts of all utilities licensed by the NRC to construct or operate nuclear power plants and of other nuclear industry organizations in all matters involving generic regulatory policy issues and on the regulatory aspects of generic operational and technical issues affecting the nuclear power industry. Every utility responsible for constructing or operating a commercial nuclear power plant in the United States is a member of NUMARC. In addition, NUMARC's members include major architect-engineering firms and all of the major nuclear steam supply system vendors.

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Mr. Samuel J. Chilk  
June 17, 1992  
Page 2

requirements, while maintaining continuity in functions which protect public and worker health and safety, and will support the development of more credible and effective training for industry radiation workers and NRC regional inspectors than would be achievable under the current compressed schedule.

Despite the earlier difficulties encountered in publishing the final revised Part 20 and delays in the development and issuance of related regulatory guidance, we believe that the ensuing time is being used productively by the industry and the NRC. There has been a high degree of communication and consideration of public input by the NRC staff in developing the new and revised regulatory guides, and the NRC staff has issued several "Question and Answer" documents in response to public questions on implementing the revised Part 20. Such efforts, which improve consistency between the NRC and licensees in interpreting the new requirements and potentially lead to greater predictability and stability in the regulatory process, will presumably be continued in the extended implementation time frame. If the proposed extension were not adopted, the time for these productive efforts would be severely limited, with a consequent negative effect on proper implementation of this important rule change.

Our support for setting January 1, 1994, as the implementation date is based on our understanding of the current status of supporting regulatory activities. We have been advised by the NRC staff that six major new or revised regulatory guides are expected to be finalized and issued by mid-year 1992 and that other supporting regulatory guides are expected to be revised and issued later in the year. We also understand that additional generic guidance is being prepared for nuclear power plant licensees regarding the preparation and submittal of proposed Operating License amendments which will be required to implement the Revised Part 20 and is expected within the next few months. If any of these items are delayed, the advantages outlined above resulting from the proposed extension of the implementation date would be diminished.

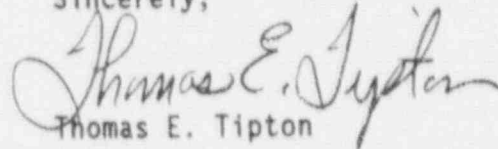
Based on the originally published implementation date of January 1, 1993, and in light of previously scheduled activities (e.g., plant outages), some utilities plan to proceed with implementation in advance of the proposed implementation date of January 1, 1994. Accordingly, we strongly urge that the NRC continue on an aggressive schedule to develop and issue regulatory guidance and generic communications in support of the revised Part 20 which will reduce the regulatory uncertainties and impacts on those utilities.

We believe that current radiation protection programs at nuclear power plants and fuel fabrication facilities adequately protect public and worker health and safety. Therefore, the schedule for implementation should be as proposed by the NRC, based on consideration of the timing for most effective implementation. We support the NRC proposed rule to extend the implementation date by one year, and we encourage continued initiatives by the NRC toward successful implementation of the revised Part 20.

Mr. Samuel J. Chilk  
June 17, 1992  
Page 3

We appreciate the opportunity to provide our comments on this very important issue. If you have any questions regarding our comments, please contact John Schmitt or me.

Sincerely,

  
Thomas E. Tipton

TET/RLA

# Rio Algom Mining Corp.

(57 FR 21216)

19-220

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AE-21-2

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'92 JUN 18 P1 56

JUNE 17, 1992

OFFICE OF SECRETARY  
DOCKETING AND SERVICE  
BRANCH

Federal Express  
Tracking No. 8672545011

Secretary  
Attn: Docketing and Service Branch  
U.S. Nuclear Regulatory Commission  
11555 Rockville Pike  
Rockville, MD 20852

Re: Proposed Extension of Implementation of 10 CFR §20.1001 - §20.2401

Dear Sir or Madam:

Rio Algom Mining Corp. and its wholly owned subsidiary, Quivira Mining Company, submits the following comments on the proposal to extend the date by which NRC licensees are required to implement the revised standard for protection against radiation to January 1, 1994. This proposal is contained in the Federal Register, Volume 57, No. 97, at 21216.

Rio Algom and Quivira Mining Company, are NRC source material licensees with uranium mining and milling interest in Ambrosia Lake, New Mexico; Lisbon Valley, Utah; and South Powder River Basin, Wyoming.

We ~~support~~ the NRC proposal for the extension of time to implement the newly promulgated regulations. The new regulations are far reaching and incorporate many new concepts. The extension provides the licensee additional time to fully evaluate and to implement those actions necessary for ultimate compliance.

Further, the extension allows for a more orderly and efficient implementation of the regulations as not all Regulatory Guides necessary to provide guidance and explain the application of the new regulations have been developed by the Commission.

In conjunction with this extension of time, Rio Algom and Quivira believes it would be prudent for NRC to develop Regulatory Guides regarding implementation of these new regulations ~~specifically for source material licensees.~~

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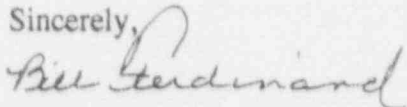
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Secretary, NRC  
June 17, 1992  
Page 2

This is especially important in light of NRC's newest standards in which most uranium mills and in-situ leach operations ~~may experience difficulties in determining compliance with~~ certain radionuclides including radon-222.

It also needs to be noted that source material licensee's must comply with the "committed dose equivalent" for long lived radionuclides such as uranium. These types of radionuclides do not attain equilibrium within the "committed" 50 year period. As such, the "committed dose equivalent" standards for uranium will substantially overestimate annual doses. Because the "committed dose equivalent" may be difficult to ascertain due to the newer limits, we believe the NRC should develop a Regulatory Guide explaining the compliance mechanisms for long lived radionuclides.

Due to these concerns, we fully support the extension of time which would allow the licensees' the necessary time to fully review and implement the necessary compliance measures. However, we also request that NRC develop Regulatory Guides addressing the implementation of these regulations and the demonstration of compliance specifically for source material licensees.

Sincerely,  
  
Bill Ferdinand, Manager  
Radiation Safety, Licensing &  
Regulatory Compliance

xc: file



19220  
(57 FR 21216)

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NRC

PDR  
AE21-2

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## URANIUM PRODUCERS OF AMERICA

'92 JUN 18 P1 58

June 17, 1992

Federal Express  
Tracking No. 3109750042

Secretary  
Attn: Docketing and Service Branch  
U.S. Nuclear Regulatory Commission  
11555 Rockville Pike  
Rockville, MD 20852

Re: Federal Register - May 19, 1992, Vol. 57, No. 97, Page 21216  
Proposed Extension of Implementation of 10 CFR §20.1001 - §20.2401

Dear Sir or Madam:

The Uranium Producers of America (UPA) is an association of domestic uranium mining companies representing most of the remaining U.S. mining companies. The UPA promotes governmental policies, regulations and legislation which assist in the long term survival and growth of the industry. These comments are submitted on behalf of the UPA.

The UPA supports the NRC proposal for the extension of time to implement the 10 CFR §20.1001 - §2401 regulations. The new regulations are far reaching and incorporate many new concepts. The extension provides the licensee additional time to fully evaluate and to implement those actions necessary for ultimate compliance.

Further, the extension allows for a more orderly and efficient implementation of the regulations as not all Regulatory Guides necessary to provide guidance and explain the application of the new regulations have been developed by the Commission.

In conjunction with this extension of time, UPA believes it would be prudent for NRC to develop Regulatory Guides regarding implementation of these new regulations specifically for source material licensees.

18  
RIO ALGOM MINING CORPORATION  
6305 WATERFORD BOULEVARD, SUITE 700  
OKLAHOMA CITY, OKLAHOMA 73115-1130



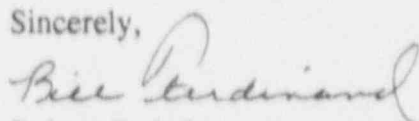
Secretary, NRC  
June 17, 1992  
Page 2

This is especially important in light of NRC's newest standards under which most uranium mills and in-situ leaching operations may be unable with current measurement technology to determine compliance with certain radionuclides including radon-222.

It also needs to be noted that source material licensee's must comply with the "committed dose equivalent" for long lived radionuclides such as uranium. These types of radionuclides do not attain equilibrium within the "committed" 50 year period. As such, the "committed dose equivalent" standards for uranium will substantially overestimate annual doses. Because the "committed dose equivalent" may be difficult to ascertain due to the newer limits, we believe the NRC should develop a Regulatory Guide explaining the compliance mechanisms for long lived radionuclides.

In summary, UPA supports the proposed extension of time which would allow the licensees' the necessary time to fully review and implement the necessary compliance measures. However, we also request that NRC develop Regulatory Guides addressing the implementation of these regulations and the demonstration of compliance for source material licensees.

Sincerely,

 FOR

Robert P. Luke  
Committee Chairman  
Technical and Regulatory Affairs Committee  
Uranium Producers of America

# YANKEE ATOMIC ELECTRIC COMPANY

Telephone (508) 779-6711

TWX 710-380-7610



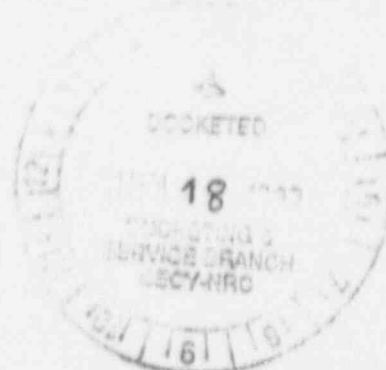
580 Main Street, Bolton, Massachusetts 01740-1398

19820  
(57 FR 21216)

June 18, 1992

FYC 92-009

SPS 92-074



Mr. Samuel J. Chilk  
Secretary  
United States Nuclear Regulatory Commission  
Washington, DC 20555

Attention: Docketing and Service Branch

Subject: NRC Proposed Rule: "Standards for Protection Against Radiation;  
Extension of Implementation Date (57FR21216)"

Dear Mr. Chilk:

The purpose of this letter is to provide Yankee Atomic Electric Company's endorsement of the subject proposed rule extending the implementation date of the revised 10CFR Part 20 regulation, "Standards for Protection Against Radiation." Yankee files this letter proposing adoption of the proposed rule on behalf of Vermont Yankee and Maine Yankee as well.

On October 24, 1991, YAEC formally requested that the Commission extend the date for implementation of the revised 10CFR Part 20 from January 1, 1993 to January 1, 1994 on the basis that the interpretive regulatory guidance associated with the rulemaking was not going to be completed on a schedule that supported implementation on January 1, 1993. It remains our position that extending the implementation date is necessary in order to provide sufficient flexibility for licensees to effectively implement the revised Part 20 rule requirements consistent with individual licensee programs.

Accordingly, we support the subject rulemaking and urge that the staff complete the associated regulatory initiatives and issue all related guidance documents as final versions before the end of this year in order to ensure successful implementation. We appreciate the opportunity to comment on this rulemaking and support the staff's efforts in ensuring the successful implementation of the new 10CFR Part 20 rule.

Very truly yours,

*D. W. Edwards*

Donald W. Edwards  
Director, Industry Affairs

DWE/dhm

**AMC**  
**AMERICAN**  
**MINING**  
**CONGRESS**

FOUNDED 1887

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202/861-2800

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Gerard E. Munera, Englewood CO  
Merle D. Wolfe, Knoxville  
John A. Wright, St. Louis  
Jeremy K. Ellis, San Francisco  
Douglas C. Yearley, Phoenix  
Gerald W. Grandey, Denver  
Bruce E. Grewcock, Omaha  
John M. Piacuch, Reston VA  
Robert C. Scharp, Oklahoma City  
James A. Todd Jr., Birmingham  
John M. Wittson, Spokane  
Jeffrey L. Zelms, St. Louis  
Sir Ian MacGregor, New York †  
N. T. Carnie, Greenbelt †  
Charles F. Barber, New York †  
Ralph E. Bailey, Stamford †

(57 FR 21216)

June 18, 1992

RECEIVED  
JUN 18 1992



AE21-2

(11)

The Honorable Samuel J. Chalk  
Secretary  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Re: ~~Proposed~~ Implementation Extension:  
10 C.F.R. § 20.1001-20.2401

Dear Mr. Chalk:

These comments are submitted by the American Mining Congress ("AMC"). AMC is a national trade association of mining and mineral processing companies. Its membership encompasses: (1) producers of most of the United States' metals, uranium, coal, and industrial and agricultural minerals; (2) manufacturers of mining and mineral processing machinery, equipment and supplies; and (3) engineering and consulting firms and financial institutions that serve the mining industry. AMC members are involved in various aspects of the uranium fuel cycle and may be affected by the proposed extension.

AMC supports the proposed extension of time and believes that such an extension will be necessary for the regulated entities to properly implement NRC's newly issued regulations in 10 C.F.R. § 20.1001-20.2401 and any accompanying Regulatory Guides to be issued by NRC. In particular, AMC suggests that additional time will be necessary for both NRC and regulated entities to address a few key outstanding issues, such as the relevant limits for long-lived radionuclides such as uranium. AMC believes that NRC should address these and other issues specifically through issuance of appropriate Regulatory Guides developed in consultation with affected entities. AMC believes that the proposed extension of time is clearly in the best interest of all parties concerned and NRC should move to finalize the proposed extension.

Very truly yours,

*James E. Gilchrist*  
James E. Gilchrist

9206290112

20

\* Immediate Past Chairman  
† Honorary



U.S. Council for Energy Awareness

Marvin S. Fertel

Vice President, Technical Programs

19820  
(57FR 21216)

DOCKETED  
USNRC

92 JUN 19 A9:27

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

AE21-2

PDR

Suite 400  
1776 I Street, N.W.  
Washington, D.C. 20006-3708  
(202) 293-0770

FAX (202) 785-4019  
(202) 785-4113

June 18, 1992

Mr. Samuel J. Chilk  
Secretary of the Commission  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Attention: Docketing and Service Branch

Reference: Standards for Protection Against Radiation; Extension of Implementation Date  
(57FR21216)  
Proposed Rule, Request for Comments

Dear Mr. Chilk:

These comments are submitted by the U.S. Council for Energy Awareness (USCEA) on behalf of its Facility Operations Committee. They are in response to the U.S. Nuclear Regulatory Commission's (NRC) request for comments on the proposed rule on Extension of Implementation Date for Standards for Protection Against Radiation.

In this response, USCEA is providing the perspective of its mining, milling, conversion, enrichment, and fabrication members. It also represents the view of its low-level waste disposal site operators, transportation members, as well as its radionuclides and radiopharmaceutical members. These members operate under NRC license and are directly impacted by the proposed rule. USCEA also endorses the comments submitted by Nuclear Management & Resources Council (NUMARC) on behalf of its utility members.

USCEA supports the proposed extension of the implementation date. We believe that this additional time will allow for orderly completion of the revised regulatory guidance and implementation of the rule. In addition, a large number of our members hold NRC and Agreement State licenses. This extension results in a uniform implementation date for both regulatory agencies. We believe this is extremely beneficial.

If you have any questions concerning this response, please contact Felix Killar or me.

Sincerely,

Marvin S. Fertel

9206290027

21

64-18-1992 15:13 101 Southern Nuclear Oper Co 10  
Georgia Power Company  
40 Inverness Center Parkway  
Post Office Box 1295  
Birmingham, Alabama 35201  
Telephone 205 877-7122

19220  
(57 FR 21216)

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USNRC

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PDR

AE21-2

C. K. McCoy  
Vice President, Nuclear  
Vogtle Project

'92 JUN 19 AIO:01

Georgia Power

June 18, 1992

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

Docket Nos. 50-321 50-424  
50-366 50-425

HL-2281  
ELV-03851

Mr. Samuel J. Chilk  
Secretary of the Commission  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

ATTENTION: Docketing and Service Branch

Comments on  
"Standards for Protection Against Radiation;  
Extension of Implementation Date"  
(57 Federal Register 21216 of May 19, 1992)

*continue to  
up. their  
mind*

Dear Mr. Chilk:

Georgia Power Company has reviewed the initiative, 10 CFR Parts 19 and 20, "Standards for Protection Against Radiation; Extension of Implementation Date" published in the Federal Register on May 19, 1992. In accordance with the request for comments, Georgia Power Company is in total agreement with the NUMARC comments which are to be provided to the NRC. In addition, Georgia Power Company provides the following comment:

Georgia Power Company has committed money and manpower resources to meeting the originally published date of January 1, 1993. Postponing the implementation will result in a protracted effort with an overall increase in the cost of implementation. We would like to emphasize that NRC development of regulatory guidance including Regulatory Guides and Technical Specification changes must move forward on a schedule to support the originally published date of January 1, 1993. Georgia Power Company strongly conveys the necessity for NRC commitment to support early implementation on January 1, 1993.

Should you have any questions, please advise.

Respectfully submitted,

*C.K.M.'s*  
C. K. McCoy

CKM/JDK

9206290057

22

Mr. Samuel J. Chilk  
U.S. Nuclear Regulatory Commission  
Page 2

cc: Georgia Power Company

Mr. J. T. Beckham, Jr., Vice President, Plant Hatch  
Mr. W. B. Shipman, General Manager - Plant Vogtle  
Mr. H. L. Sumner, Jr., General Manager - Plant Hatch  
NORMS

U. S. Nuclear Regulatory Commission, Washington, DC  
Mr. K. N. Jabbour, Licensing Project Manager - Hatch  
Mr. D. S. Hood, Licensing Project Manager - Vogtle

U. S. Nuclear Regulatory Commission, Region II  
Mr. S. D. Ebnetter, Regional Administrator  
Mr. L. D. Wert, Senior Resident Inspector - Hatch  
Mr. B. R. Bonser, Senior Resident Inspector - Vogtle



PROPOSED RULE FR 19220  
(57 FR 21216)

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AE 21-2

DOCKETED  
USNRC

'92 JUN 22 P3:50

566 Springhill Circle  
Naperville, IL 60563  
June 15, 1992

Secretary  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555  
Attention: Docketing and Service Branch

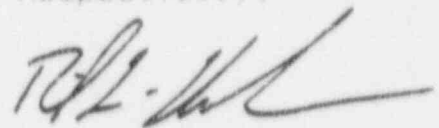
Dear Sir or Madam:

I am writing in reference to proposed rule to extend the implementation date for the revised standards for protection against radiation (10 CFR 20.1001-20.2401). I wish to express my support for the proposed delay to January 1, 1994.

I am a health physicist and therefore utilize the rule on a daily basis. As was pointed out in the Background section of the notice published in the Federal Register, there are two very clear rationations for delaying. Logistically, having NRC licensees and agreement states implement at the same time would be significantly less burdensome. I believe, more importantly, however, that additional guidance in the form of final regulatory guides must be in place with a sufficient time frame for licensees to review and adjust their programs accordingly.

I concur with all of the issues brought up in the Federal Register notice and again wish to emphasize my support for the proposed rule to delay implementation of 10 CFR 20.

Respectfully,

  
Rick L. Thacker, CHP

9206290031



Public Service Electric and Gas Company P.O. Box 236 Hancocks Bridge, New Jersey 08038  
Nuclear Services

19820  
(57 FR 21216)

DOCKETED  
USNRC

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92 JUN 22 P3:55

AE21-2

June 15, 1992

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

Secretary  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Attention: Docketing and Servicing Branch

Gentlemen:

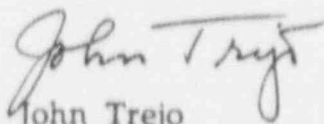
Public Service Electric and Gas Company would like to offer comment on the proposed rule to extend the implementation date of the revised 10 CFR Part 20, "Standards for Protection Against Radiation," in response to the Federal Register notice of May 19, 1992, (57 Fed. Reg. 21216). We support adoption of the proposed rule by the NRC. We believe that changing the required implementation date to January 1, 1994, will better support correct, effective and efficient implementation of the revised Part 20. It will provide adequate time for us and other licensees to examine the new and revised regulatory guides that are currently being developed to clarify key ideas of the revised Part 20 and to develop or revise regulation compliance capability based on this guidance. The date change will also aid the development and implementation of revised programs in a more coherent manner than would have resulted with the existing one year difference in implementation dates for NRC and Agreement State licensees. The proposed extension will also allow us to better allocate resources to implementing new requirements, while maintaining continuity in functions that protect public and worker health and safety, and will support the development of more effective training for industry radiation workers and regional inspectors, than would be achievable under the current schedule.

Our support for setting January 1, 1994, as the implementation date is based on our understanding of the status of supporting regulatory activities. We understand that six major new or revised regulatory guides should be completed and issued by mid-year 1992 and that other existing regulatory guides will be revised and issued later in the year. We also understand that additional guidance is being prepared for nuclear power plant licensees regarding the preparation and submittal of proposed Operating License amendments that will be required to implement the Revised Part 20 and is expected within the next few months. If any of these items is delayed, the advantages outlined above resulting from the proposed extension of the implementation date will be diminished.

We believe that our current radiation protection program, as well as programs at other nuclear power plants and at fuel fabrication facilities adequately protect public and worker health and safety. Because of this, the schedule for implementation

should be decided, as proposed by the NRC, based on consideration of the timing for most successful implementation. It would be imprudent to rush the schedule after all the years it has taken to develop the Revised Part 20 especially since earlier implementation will not achieve significant additional protection. We support the NRC proposal to adjust the implementation date and encourage continued initiatives by the NRC toward successful implementation. We appreciate the opportunity to provide our comments on this very important issue. Please contact me if you have any questions regarding our comments.

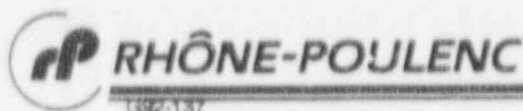
Sincerely,

A handwritten signature in cursive script, appearing to read "John Trejo".

John Trejo  
Manager - Radiation Protection/  
Chemistry Services

C General Manager - Nuclear Services

File NRP-92-0481



DOCKET NUMBER 19220  
(57 FR 21216)

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AF-21-2  
DOCKETING & SERVICE  
BRANCH

RHONE - POULENC INC.  
6213 HIGHWAY 332-E  
FREEPORT, TEXAS 77541  
TEL: (409) 233-7871 TELEX 792716

June 16, 1992

'92 JUN 22 P3:51

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

Secretary  
US Nuclear Regulatory Commission  
Attn: Docketing & Service Branch  
11555 Rockville Pike  
Rockville, Maryland  
Washington, DC 20555

Re: Standards for Protection Against  
Radiation: Extension of Implementation  
Date, 57 FR 21216

Dear Sir:

Rhone-Poulenc is please to offer our comments in support of the Commission's proposed rule referenced at 57 FR 21216. We concur with the Commission's opinion as stated at 57 FR 21216. In this sensitive area of radioactive materials handling it is advantageous for both the regulated community, the regulatory agency, and the citizens that an orderly and efficient implementation of these rules be provided for. It also is efficient utilization of both the regulatory agency's and the regulated communities' resources to provide for concurrent implementation dates for NRC licensees and agreement states eliminating the time during which two differing sets of Part 20 would be enforced by the agreement states and NRC.

With these comments we reiterate our support for extension of the implementation date to January 1, 1994. If we may be of further assistance or provide additional information, please contact me at your convenience.

Sincerely,

Gerald W. Walker, P.E.  
Radiation Safety Officer  
HS&E Manager

GWW:kq

cc: R. Miles; J. Sheehan; C. R. Yavebaugh; R. Torrito

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25



19 & 20  
(57 FR 21216)

P.O. Box 14000, Juno Beach, FL 33408-0420

June 17, 1992  
L-92-181

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USNRC

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AE21-2

'92 JUN 22 AIO:36

Mr. Samuel J. Chilk  
Secretary of the Commission  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

Attention: Docketing and Servicing Branch

Re: Proposed Rule  
Standards for Protection Against Radiation;  
Extension of Implementation Date  
57 Fed. Reg. 21216 (May 19, 1992)  
Request for Comments

Dear Mr. Chilk:

At 57 Fed. Reg. 21216, the NRC requested comments on a proposed rule to extend the implementation date of the revised 10 CFR Part 20, "Standards for Protection Against Radiation." These comments are submitted in behalf of the Florida Power & Light Company (FPL), a licensed operator of two nuclear power plant units in Dade County, Florida, and two nuclear power plant units in St. Lucie County, Florida.

FPL supports adoption of the proposed rule by the NRC. Extending the required implementation date to January 1, 1994, will provide the following benefits:

- ♦ Provide adequate time to review the needed regulatory guides that are still under development, as well as NRC's responses to the implementation questions which are being submitted by licensees.
- ♦ Provide adequate time to determine what is the most effective way to incorporate the changes into our existing Radiological Protection program.
- ♦ Provide adequate time to complete, test and document necessary computer software changes in accordance with QA requirements on software administration and control.

Utilities in Region II, and other regions, have been meeting regularly to discuss ways of implementing the changes and improve consistency in interpreting the new requirements. FPL has supported this effort and has benefitted from these discussions. If the proposed extension were not adopted, the time for these interactions and discussions would be severely limited.

The industry needs the final regulatory guides, answers to the questions on interpretation which have been submitted, and guidance for preparing and submitting any required operating license amendments. These regulatory activities must proceed without further delays in order for licensees to get the full benefit of the extension.

9206290041

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Mr. Samuel J. Chilk  
June 17, 1992  
Page 2

FPL also endorses NUMARC's comments provided to the NRC on this issue. We appreciate the opportunity to provide these comments on this very important matter. If you have any questions regarding these comments, please contact me at 407/694-4213.

Sincerely,

A handwritten signature in cursive script, appearing to read "J. L. Danek".

Joseph L. Danek  
Manager - Corporate Health Physics/Chemistry





South Carolina Electric & Gas Company  
P.O. Box 88  
Jenkinsville, SC 29065  
(803) 345-4040

John L. Skolds  
Vice President  
Nuclear Operations

DOCKETED  
USNRC

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HE-21-2  
18

June 17, 1992

DOCKET NO. 50/395  
PROPOSED RULE 19020  
(57 FR 21216)

'92 JUN 22 P3:50

Secretary  
U. S. Nuclear Regulatory Commission  
Washington, DC 20555

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

Attention: Docketing and Servicing Branch

Gentlemen:

Subject: VIRGIL C. SUMMER NUCLEAR STATION  
DOCKET NO. 50/395  
OPERATING LICENSE NO. NPF-12  
COMMENTS ON PROPOSED RULE REGARDING 10CFR20 (PR 910008)

This letter provides comments on the proposed rule to extend the required implementation date of the revised 10 CFR Part 20, "Standards for Protection Against Radiation," in response to the Federal Register notice of May 19, 1992, (57 Fed. Reg. 21216).

South Carolina Electric & Gas Company (SCE&G) supports the adoption of the proposed rule by the NRC. Changing the required implementation date from January 1, 1993 to January 1, 1994, will better support correct, effective, and efficient implementation of the revised Part 20. It will provide adequate time for licensees to examine the new and revised regulatory guides that are still being developed while maintaining continuity in the existing regulations to protect public and worker health and safety.

There has been a high level of effort and consideration of public input by the NRC staff in developing the revised rule and the new and revised regulatory guides. Such efforts, which improve consistency between the NRC and licensees in establishing greater predictability and stability in the regulatory process, could be severely impacted if the proposed extension was not adopted.

SCE&G believes that the current radiation protection programs at nuclear power plants adequately protect public and worker health and safety. Therefore, the implementation date should be determined based on consideration of what will yield the most efficient, consistent and successful program. SCE&G supports the NRC proposal to adjust the implementation date and encourages the continued initiatives of the NRC toward consistent implementation.

Should you have any questions, please contact David Haile at (803) 345-4322.

Very truly yours,

John L. Skolds

DCH:lcd

c: See Page 2

9205240020

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Secretary  
PR 910008  
Page 2 of 2

c: O. W. Dixon  
R. R. Mahan  
R. J. White  
G. F. Wunder  
General Managers  
NSRC  
RTS (PR 910008)  
File (811.02)



DOCKET NUMBER

RULE

(57 FR 21216)

JULIET  
USNRC

19

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June 17, 1992

RA-92-006

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

Secretary  
U.S. Nuclear Regulatory Commission  
ATTN: Docketing and Service Branch  
Washington, D.C. 20555

Subject: Standards for Protection Against Radiation; Extension of  
Implementation Date

Dear Sir:

The subject rule, published May 19, 1992 (57 FR 21216), would extend the date by which Nuclear Regulatory Commission licensees are required to implement the revised standards for protection against radiation (10 CFR 20.1001-20.2401 and the accompanying appendices) and to make a conforming change to Part 19. The proposed extension to the implementation date is from January 1, 1993 to January 1, 1994.

Combustion Engineering fully endorses the proposed rule change. We agree that the delay in the implementation date to January 1, 1994 will provide licensees time to evaluate the regulatory guidance being developed and will result in more effective implementation of the rule.

If we can be of any additional assistance in this matter, please do not hesitate to contact us.

Very truly yours,

COMBUSTION ENGINEERING, INC.

A. Edward Scherer  
Vice President  
Regulatory Affairs

9206290034

AES:ss

ABB Combustion Engineering Nuclear Fuel



**ENTERGY**

19220  
(57 FR 21216)

DOCKETED  
USNRC

Entergy Operations, Inc. AL-21-2

PO Box 31995  
Jackson, MS 39286-1995  
Tel: 601 984 9700

'92 JUN 22 A9:52

John R. McGaha  
Vice President  
Customer Support

OFFICE OF SECRETARY  
DOCKETING AND SERVICE  
BRANCH

June 18, 1992

Mr. Samuel J. Chilk  
Secretary of the Commission  
U. S. Nuclear Regulatory Commission  
Washington, D.C. 20555

ATTN: Docketing and Service Branch

Subject: Proposal to Extend Implementation Date of the Revised 10 CFR Part  
20 Rule

CNRO-92/00053

Dear Mr. Chilk:

Entergy Operations, Inc. has reviewed the proposed rule to extend the implementation date of the revised 10 CFR Part 20, "Standards for Protection Against Radiation." In accordance with NRC's invitation to submit comments, we offer the following on behalf of Arkansas Nuclear One, Units 1 & 2, Grand Gulf Nuclear Station, and Waterford-3 Steam Electric Station.

We support adoption of the proposed rule by the NRC. The implementation date of January 1, 1994 will provide time to revise and implement our programs in a more coherent manner than would have been possible by the previous date. This is based upon our understanding of the current status of supporting regulatory activities. We wish to emphasize that delays in issuance of the remaining guidance will diminish our ability to adequately implement the new requirements within the proposed time frame.

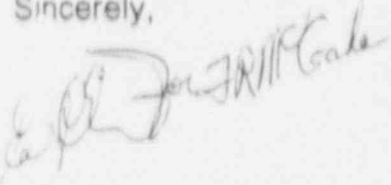
Also, we have reviewed the response of NUMARC on this subject and concur with their comments.

9206290098

Comments on Proposed Extension of 10 CFR Part 20 Rule Implementation  
CNRO-92/0053  
Page 2 of 2  
June 18, 1992

We appreciate the opportunity to provide our comments of this important issue. Further we applaud your initiative to date on this topic and encourage continued joint efforts toward the successful implementation of this important rule. If we may be of further assistance in this matter, please contact Gary Morrison at (601) 984-9374.

Sincerely,



JRM/jkw

cc:

Mr. T. W. Alexion	Ms. S. R. Peterson
Mr. R. P. Barkhurst	Mr. N. S. Reynolds
Mr. N. S. Carns	Mr. R. L. Simard
Mr. W. T. Cottle	Ms. L. J. Smith
Mr. J. G. Dewease	Mr. W. F. Smith
Mr. S. D. Ebner	Mr. D. L. Wigginton
Mr. D. C. Hintz	Central File (GGNS)
Mr. R. D. Martin	Corporate File [ ]
Mr. J. L. Mathis	DCC (ANO)
Mr. P. W. O'Connor	Records Center (WF-3)

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(57FR 21216)

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USNRC

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OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH



VIRGINIA POWER

June 18, 1992

Secretary  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Serial No.  
NLP/RBP

92-414

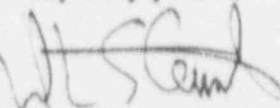
Gentlemen:

**COMMENTS ON PROPOSED RULE  
STANDARDS FOR PROTECTION AGAINST RADIATION  
EXTENSION OF IMPLEMENTATION DATE**

In the May 19, 1992 Federal Register, the NRC issued proposed rulemaking to extend the implementation date for the revised standards for protection against radiation in 10CFR19 and 20. Virginia Power endorses the policy of providing adequate implementation time following publication of accompanying regulatory guidance in order for a "more orderly and efficient implementation." We believe that this proposed rule to delay implementation is therefore justified and beneficial to both the industry and the NRC.

Virginia Power concurs with the comments provided by NUMARC provided separately to the NRC.

Very truly yours,

  
W. L. Stewart

Attachment

cc: Mr. Ron Simard  
Director, Industry Relations and Administration Division  
Nuclear Management and Resources Council  
1776 Eye Street, N. W.  
Suite 300  
Washington, D. C. 20006-2496

9206290057





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(57 FR 21216) AE21-2  
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LOCKETED  
USNRC

Donald C. Shelton  
Vice President - Nuclear  
Davis-Besse

'92 JUN 22 P3:46

300 Madison Avenue  
Toledo, OH 43652-0001  
(419) 249-2300

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

Docket Number 50-346

License Number NPP-3

Serial Number 2057

June 18, 1992

Secretary, United States Nuclear Regulatory Commission  
Washington, D.C. 20555  
Attention: Docketing and Service Branch

Subject: Comments On Proposed Rule: Standards For Protection Against  
Radiation, Extension Of Implementation Date

Gentlemen:

Toledo Edison concurs with the Proposed Rule, published in the Federal Register on May 19, 1992 (57 FR 21216), which would extend the implementation date for the new 10 CFR Part 20 revisions from January 1, 1993 until January 1, 1994.

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.

Please refer any questions regarding these comments to Mr. Robert W. Schrauder at (419) 321-2366.

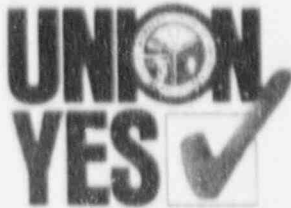
Very truly yours,

*[Signature]*  
MAT/ed

cc: A. B. Davis, Regional Administrator, NRC Region III  
J. B. Hopkins, NRC Senior Project Manager  
W. Levis, DB-1 NRC Senior Resident Inspector  
USNRC Document Control Desk  
Utility Radiological Safety Board

9206290084

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19220  
(57 FR 21216)  
UTILITY WORKERS UNION OF AMERICA

LOCAL No. 246-AFL-CIO  
10355 LOS ALAMITOS BOULEVARD  
LOS ALAMITOS, CALIFORNIA 90720-2190  
(213) 594-2981 (714) 995-6299  
1-800-228-2998

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'92 JUN 22 P3:49

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

June 18, 1992

Attention: Docketing and Service Branch  
Secretary,  
U.S. Nuclear Regulatory Commission  
Washington DC 20555

RE: RIN 3150-AE21

Dear Secretary,

Enclosed you will find an original and 5 copies of comments being submitted on behalf of the Utility Workers Union of America, AFL-CIO, Local #246 in the above referenced matter. Local 246 of the Utility Workers Union of America represents the Operations, Maintenance, Technical, Material Support and Clerical personnel at the San Onofre Nuclear Power Plant operated by Southern California Edison Company.

If you have any questions and/or wish to discuss this matter, please feel free to contact our office.

Sincerely,

Bernardo R. Garcia  
Safety & Research Director  
Local 246

9206290045

**Comments of:**

**The Utility Worker Union of America, AFL-CIO**

**on the**

**Proposed Extension  
of the Implementation Date for the changes to  
the Standards for Protection Against Radiation  
10CFR Parts 19 and 20**

The Commission's proposed extension of the implementation date for the revised Standards for Protection Against Radiation is without merit, unwarranted and irresponsible. For the Commission to propose delaying these revisions further ignores the fact that the proposed revisions have been reviewed, commented on and analyzed extensively since their original proposal in 1986. It is our belief that 6 years is more than enough time for the Commission and the Industry.

While the Commission and the Nuclear Industry review and further delay the changes to 10CFR Parts 19 and 20, the approved revisions have already become outdated and obsolete. As these delays and long waits have been taking place, the International Community has moved forward in protecting workers with standards even more stringent than those the Commission now proposes delaying further. To delay the already inadequate standards further ignores the health and safety of the workers in nuclear power plants as well as public safety. While America should be leading the International Community in the protection of worker health and safety, it appears as though the only thing we are doing is coddling NUMARC and the Industry. The Commission's role is not to protect the Industry but rather to protect and safeguard the Public as well as the Workers in Nuclear Power Plants. The days of the AEC promoting and regulating nuclear power are gone, the Commission's role is to protect the health and safety of the public and workers in nuclear power plants.

It appears as though the Commission has proposed this extension of time only as a formality, as the Commission informed the Industry months ago that the implementation date would be extended to January 1, 1994. In view of this action it would appear as though the Commission is attempting to circumvent the proper rulemaking process.

The Nuclear Industry (with a bottomless pit of funding namely utility ratepayers) spends considerable time and resources analyzing and commenting on proposed changes to standards. While at the same time the public and workers or their representatives must challenge this publicly funded monster with very little or no resources at all. NRC Regulations should be changed to provide alternative methods of notifying the public and workers or their representatives of proposed changes to NRC Regulations. In nuclear power plants where the workers are represented by unions, the Commission should notify the Union directly of the proposed changes. While the Licensees can hire full time staffs (with the public's money i.e. utility rates) to review the Federal Register on a daily basis, the public and workers or their representatives must hope that these proposed changes can be spotted in time to even have the opportunity to submit comments; comments that are often drafted at home after hours not on the job while being paid by the utility with the public's money.

While we are sympathetic to the Regulatory hurdles that must be over come such as drafting Regulatory Guides, we cannot endorse a further delay in the implementation of the revisions to 10CFR Parts 19 and 20. When will Government begin to be sympathetic to the health and safety of the public and workers. Workers were patient and trusting with Government and Industry when it came to asbestos and

look what it got us. Industry continued to operate as normal while workers slowly contracted diseases that caused a slow painful death. If we sound impatient and unyielding it's because we are at this point. We have waited for these changes since 1986 and we cannot wait any longer. We want additional changes to existing standards making them more stringent and in line with ICRP recommendations. We have little patience when it comes to further delaying standards that are based upon scientific data that is 8 years old. We strongly recommend that the proposed extension of time for implementation be denied.

Respectfully,

Utility Workers Union of America, AFL-CIO



Southern Nuclear Operating Company  
Post Office Box 1295  
Birmingham, Alabama 35201  
Telephone 205 868-5088

DOCKET NUMBER  
PROPOSED RULE PR 19 220  
57 FR 21216

DOCKETED  
USNRC

24

PDR

AC 21-2

'92 JUN 22 A9:42

Southern Nuclear Operating Company  
the southern electric system

J. D. Woodard  
Vice President  
Farely Project

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

Docket Nos. 50-348  
50-364

June 19, 1992

Mr. Samuel J. Chilk  
Secretary of the Commission  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

ATTENTION: Docketing and Service Branch

Comments on  
"Standards for Protection Against Radiation;  
Extension of Implementation Date"  
(57 Federal Register 21216 of May 19, 1992)

Dear Mr. Chilk:

Southern Nuclear Operating Company has reviewed the initiative, 10 CFR Parts 19 and 20, "Standards for Protection Against Radiation; Extension of Implementation Date" published in the Federal Register on May 19, 1992. In accordance with the request for comments, Southern Nuclear Operating Company is in total agreement with the NUMARC comments which are to be provided to the NRC. In addition, Southern Nuclear Operating Company provides the following comment:

Southern Nuclear Operating Company has committed money and manpower resources to meeting the originally published date of January 1, 1993. Postponing the implementation will result in a protracted effort with an overall increase in the cost of implementation. We would like to emphasize that NRC development of regulatory guidance including Regulatory Guides and Technical Specification changes must move forward on a schedule to support the originally published date of January 1, 1993 in order to prevent costly delays and schedule interruptions. Southern Nuclear Operating Company strongly conveys the necessity for NRC commitment to support early implementation on January 1, 1993.

Should you have any questions, please advise.

Respectfully submitted,

J. D. Woodard

JDW/JDK

9206290089



**NORTHEAST UTILITIES**

THE CONNECTICUT LIGHT AND POWER COMPANY  
 WESTERN MASSACHUSETTS ELECTRIC COMPANY  
 HOLYOKE WATER POWER COMPANY  
 NORTHEAST UTILITIES SERVICE COMPANY  
 NORTHEAST NUCLEAR ENERGY COMPANY

19220  
 (57 FR 21216)

RECEIVED  
 USNRC

General Offices • Selden Street, Berlin, Connecticut

P.O. BOX 270  
 HARTFORD, CONNECTICUT 06141-0270  
 (203) 665-5000

'92 JUN 23 P3:08

OFFICE OF SECRETARY  
 DORLAND S. LEVINE  
 USNRC

June 16, 1992

Docket Nos. 50-213  
 50-245  
 50-336  
 50-423  
 B14172

PDR  
 AE21-2

Mr. Samuel J. Chilk, Secretary  
 U.S. Nuclear Regulatory Commission  
 Attn: Docketing and Service Branch  
 Washington, DC 20555

Dear Mr. Chilk:

Haddam Neck Plant  
 Millstone Nuclear Power Station, Unit Nos. 1, 2, and 3  
Extension of Revised 10CFR20 Implementation Date

On May 19, 1992,<sup>(1)</sup> the NRC published, in the Federal Register, a proposed rule that would extend the implementation date of the revised 10CFR20, "Standards for Protection Against Radiation." The proposed rule would extend the date by which licensees are required to implement the revised standards for protection against radiation to January 1, 1994. The proposed rule would also provide licensees additional time to examine and implement the regulatory guidance developed to support the rule, and to establish a concurrent implementation date for NRC licensees and Agreement State licensees by eliminating the one-year period during which agreement states could continue to enforce the existing 10CFR20 while the NRC would be enforcing the revised standards.

The purpose of this letter is to provide the Staff with Connecticut Yankee Atomic Power Company (CYAPCO) and Northeast Nuclear Energy Company's (NNECO) comments on the proposed rule, and to endorse those comments provided by the Nuclear Management and Resources Council. CYAPCO and NNECO support adoption of the proposed rule, and believe that changing the required implementation date to January 1, 1994, will better support effective and efficient implementation by licensees of the revised 10CFR20. Extending the implementation date will provide sufficient time for licensees to examine the new and revised Regulatory Guides, to clarify key concepts of the revised 10CFR20, and to develop or revise regulatory compliance capability based on that guidance. The date change will also aid the development and implementation of revised programs in a more coherent manner than would have resulted with the existing one-year difference in implementation dates for NRC and agreement state licensees.

(1) Federal Register, Vol. 57, No. 97.

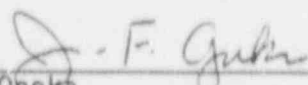
9206290035

Mr. Samuel J. Chilk  
B14172/Page 2  
June 16, 1992

CYAPCO and NNECO support the NRC proposal to extend the implementation date and encourage continued initiatives by the NRC toward successful implementation.

Very truly yours,

CONNECTICUT YANKEE ATOMIC POWER COMPANY  
NORTHEAST NUCLEAR ENERGY COMPANY

  
\_\_\_\_\_  
J. F. Opeka  
Executive Vice President

cc: A. B. Wang, NRC Project Manager, Haddam Neck Plant  
J. W. Andersen, NRC Acting Project Manager, Millstone Unit No. 1  
G. S. Vissing, NRC Project Manager, Millstone Unit No. 2  
V. L. Rooney, NRC Project Manager, Millstone Unit No. 3  
J. T. Shedlosky, Senior Resident Inspector, Haddam Neck Plant  
W. J. Raymond, Senior Resident Inspector, Millstone Unit Nos. 1, 2, and 3  
D. H. Jaffe, Nuclear Reactor Regulation

U.S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, DC 20555

DOCKETED  
USNRC

'92 JUN 24 P12:25

19220  
(57 FR 21216)

OFFICE OF SECRETARY  
DOCKETING & RECORDS  
MANAGEMENT



VIRGINIA POWER

PDR

AE21-2

June 17, 1992

Dr. Donald A. Cool  
Chief, Radiation Protection  
and Health Effects Branch  
Division of Regulatory Applications  
Office of Nuclear Regulatory Research  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Dear Dr. Cool:

In the May 19, 1992 Federal Register, the NRC issued proposed rulemaking to extend the implementation date for the revised standards for protection against radiation in 10CFR19 and 20. Virginia Power endorses the policy of providing adequate implementation time following publication of accompanying regulatory guidance in order for a "more orderly and efficient implementation." We believe that this proposed rule to delay implementation is therefore justified and beneficial to both the industry and the NRC.

Virginia Power concurs with the comments provided by NUMARC which were provided separately to the NRC. The following additional supporting comments on the proposed rule are offered for your consideration:

1. The present lack of finalized Regulatory Guides and the need to further study the rule, as noted in the Federal Register notice are significant reasons for delaying the rule's implementation. Similarly, training based on completely developed and revised Radiation Protection procedures incorporating guidance from these yet to be finalized Regulatory Guides is not likely to be completed within the present January 1, 1993 implementation schedule.
2. The additional one year period permits the industry the additional time to perform a more orderly and thorough performance verification of their automated exposure management systems, which I believe to be the area most significantly impacted by the revision of 10CFR20. The opportunity for more complete field testing, debugging, fine tuning, and training is made available with the rule extension.

9206290085

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3. North Anna Power Station will be commencing its Steam Generator Replacement (SGR) outage on January 1, 1993, a date which has been escalated from 1995. Required preparations coupled with contractual resources to support this outage does not allow for an organized, efficient and thorough implementation. The primary concern with implementing the revised 10CFR20 concurrent with the SGR outage is the availability of contractors adequately trained on the new 10CFR20.
4. Major efforts for supporting the revised 10CFR20 are in the area of exposure control. Because North Anna Exposure Control is planning to implement a new Panasonic TLD system on January 1, 1993, which includes requirements for NVLAP accreditation, implementation of the new 10CFR20 and the TLD systems would be difficult with existing resources.
5. In addition to the lack of finalized Regulatory Guides and the NRC's Question/Answer documents, which are under development, there are several technical issues which must be addressed prior to rule implementation to ensure consistent basis for enforcement is achieved. Region II is currently developing technical positions to address those aspects of the revised rule which remain nebulous and require further clarification.
6. Power reactor licensees are also evaluating INPO 91-014, Radiation Protection Programs for Nuclear Power Plants, against the revised rule. There is some incompatibility between the provisions contained in the revised rule concerning internal and external exposures and the guidance given in INPO 91-014. Reactor licensees need to reconcile these discrepancies and establish Radiation Protection programs which satisfy the requirements of NRC as well as criteria established by INPO.
7. Extending the implementation date for NRC licensees one year will provide an implementation schedule in phase with the planned implementation of the Environmental Protection Agency's new Protective Action Guides (PAGs), which will be based on the dose equivalent methodology. The NRC staff has not developed evaluation criteria for implementation of the PAGs. Postponement of the revised 10CFR20 implementation date would further aid the consistent and parallel development of dose methodology for both the Radiation Protection and Emergency Preparedness programs.

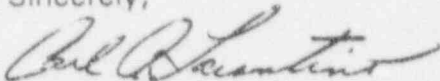
June 17, 1992

8. 10CFR20.1008 provides the opportunity to implement the rule change early, i.e. prior to January 1, 1994. There is no current or anticipated guidance for addressing the exposure recordkeeping requirements for transient workers who may receive occupational exposures under both the current and revised 10CFR20. The additional one year period will allow for smoother transition period for familiarization with the new exposure control requirements which will better equip the licensees to handle transient workers' exposure records generated under both the current and revised 10CFR20 rules.
9. Related to NRC's goal to implement the revised rule with consistent enforcement and in an orderly and efficient manner is the issue of trained inspectors and development of inspector modules. The Region II inspectors have received 10CFR20 training which has been limited in scope to the basic fundamental provisions of the revised rule. Additional training is planned during 1992. Recognizing that there are several provisions in the revised rule which require further clarification, which I have already addressed in this letter, the additional one year period will also give the NRC the necessary time to develop the inspector modules and provide the NRC with more in depth 10CFR20 training which will enhance the NRC's ability to meet their stated goal in the proposed rulemaking.

I appreciate the opportunity to respond individually to the proposed rulemaking dated May 19, 1992 and hope that considerations are given to my comments for justifying the delay in implementation of the revised 10CFR20.

If you have any questions regarding these concerns, please contact me at (804)273-3068.

Sincerely,



Carl A. Tarantino  
Senior Staff Health Physicist, VA Power

CAT:cat/052LTR



Commonwealth Edison  
1450 Opus Place  
Downers Grove, Illinois 60515

DOCKET NUMBER  
PROPOSED RULE **PR 19-20**  
(57 FR 21216)

DOCKETED  
USNRC

27  
PDR

'92 JUN 24 12:24

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

June 17, 1992

Secretary of the Commission  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Attn: Docketing and Service Branch

Commonwealth Edison would like to take this opportunity to comment on the rule change in 10 CFR Parts 19 and 20 (57 Federal Register 21216, May 19, 1992).

Commonwealth Edison supports the proposal to extend the implementation date of the revised radiation protection standards (10 CFR 20.1001-20.2401) and the implementing changes to January 1, 1994.

The revision to 10 CFR Part 20 approved on December 13, 1990 was the greatest single revision to radiation protection standards in the history of the nuclear industry. It is appropriate that the industry be given an additional year to prepare for the implementation of this major rule change.

As stated in the Supplementary Information Section of the proposed rule, there have been delays both in the issuance of the rule itself and in the issuance of regulatory guides. The extension of the implementation date to January 1, 1994 would allow time for: final regulatory guides to be issued; resources to be utilized effectively; and consistency among radiation protection programs in the nuclear industry.

Commonwealth Edison appointed a centralized group to coordinate the revised 10 CFR Part 20 implementation. The additional year would provide that group with the opportunity to:

- review and revise radiation protection programs within the Company in a much more thorough manner;
- incorporate appropriate information offered by final regulatory guides;
- achieve consistency with other licensees within the industry; and
- ensure that workers are provided adequate training on the 10 CFR Part 20 changes prior to program implementation.

9206290018



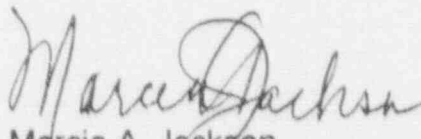
June 17, 1992

The current requirement for a 1993 implementation has offered challenges to the project, particularly, in the training area. Implementation of the revised rule involves revisions to procedures, record systems, computer programs, lesson plans, and finally, training to the thousands of workers affected by the changes. Many of these activities must progress concurrently in order to meet the current project and implementation schedule. Since regulatory guides have not been issued in final form some procedures, program and lesson plans require "hold points" until all appropriate information has been received and reviewed. The additional year allows a much more reasonable and logical sequencing of tasks within the project.

Finally, from a financial viewpoint, it is desirable for Commonwealth Edison to implement the revised rule in 1994 in order to utilize existing resources more efficiently and to spread the program development costs over an additional year.

Thank you for this opportunity to comment on the proposed rule change to extend the required implementation of the revised 10 CFR Part 20 to January 1, 1994. It is important that this issue be resolved quickly so that project schedules can be firmly aligned with the appropriate date.

Respectfully,



Marcia A. Jackson  
Nuclear Licensing Administrator  
Generic Issues

cc: R. Barrett-Project Director, NRR  
A. Bert Davis-Regional Administrator, RIII

NORA A. NICHOLSON  
10708 HEAVENWOOD COURT  
SPOTSYLVANIA, VIRGINIA 22553

DOCKET NUMBER  
PROPOSED RULE 19220  
(57 FR 21216)

LOCALITY  
USNRC

(28)

June 18, 1992

'92 JUN 24 P12:25  
AE21-2

U.S. Nuclear Regulatory Commission  
Office of Nuclear Regulatory Research  
Washington, D.C. 20555  
Attn: Dr. Donald A. Cool  
Chief, Radiation Protection and Health Effects Branch  
Division of Regulatory Research

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

Re: Federal Register Notice; Vol. 57, No. 97, 05/19/92  
Extension of Implementation Date for Revised 10CFR20

Dear Dr. Cool:

I support the proposal in the above Federal Register Notice to extend implementation of the revised 10CFR20 to January 1, 1994. In addition to the justification presented in the above notice, the following comments are given to support the extension.

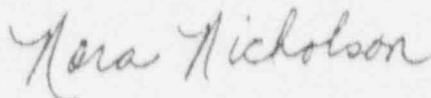
- Final versions of regulatory guidance - including the Regulatory Guides and I & E responses to Questions and Answers - are necessary to develop a radiation protection program to provide safe and effective implementation of the revised 10CFR20. This guidance would provide direction on unresolved technical and programmatic issues generated by the revised 10CFR20. Adequate lead time to complete this development, as would be provided by the extension to January 1, 1994, is necessary, since release of the final drafts of the Regulatory Guides is scheduled for late June 1992.
- The additional year is necessary to develop and implement computerized dose tracking systems to support requirements of the revised 10CFR20, particularly the final versions of Forms 4 and 5, which are scheduled for release late June 1992, with the Regulatory Guides.
- A steam generator replacement outage at the commercial nuclear power station where I am employed is scheduled for January 1, 1993. If the implementation date remained as January 1, 1993, efficient and safe implementation of the revisions during this outage would add significant stress on radiation protection program resources. The station and radiation protection staffs would be operating under not-yet-familiar regulations during high level work activities associated with steam generator removal and replacement. Compounding this transition would be the influx of hundreds of contractors as temporary outage support personnel who have to be trained on the revisions, processed in accordance with the new dose assessment methodologies of the revisions and be provided with jobsite or on-site health physics coverage and practices in accordance with the revisions. The extension to January 1, 1994 would permit completion of this scheduled outage and further development of the radiation protection program as noted in the above two comments.

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- The implementation date for the revised EPA Protection Action Guides is January 1, 1994. The dose assessment methodology for the revised PAGs is similar to that of the revised 10CFR20. However, it is my understanding the NRC staff has not yet developed evaluation/inspection criteria for implementation of the PAGs. Extending the implementation date for the revised 10CFR20 would further support the consistent and parallel development of dose methodology for both the radiation protection and emergency preparedness programs.

To reiterate, I support the proposal for the extension which would provide more time for licensees to develop a radiation protection program that promotes complete and safe implementation of the revisions. Your consideration of my comments is sincerely appreciated. If you need further elaboration on the above, please contact me at (703) 8942419.

Sincerely,



Nora A. Nicholson, CHP

NAN/waj

cc: A. H. Stafford  
L. B. Jones  
D. L. Horn  
C. A. Tarantino

U. S. NRC  
Attention: J. Wigginton  
Inspection & Enforcement  
Washington, D.C. 20555



DOCKET NUMBER  
PROPOSED RULE PR 19220  
(57 FR 21216) PDR  
(29)  
AF21-2  
DOCKETED  
USNRC

92 JUN 24 A9:25

1650 CALVERT CLIFFS PARKWAY • LUSBY, MARYLAND 20657-4702

GEORGE C. CREEL  
VICE PRESIDENT  
NUCLEAR ENERGY  
(410) 260-4455

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

June 19, 1992

The Secretary  
U. S. Nuclear Regulatory Commission  
Washington, DC 20555

ATTENTION: Docketing and Service Branch

SUBJECT: 10 CFR Part 20, "Standards for Protection Against Radiation" (57 FR 21216, May 19, 1992)

Gentlemen:

This letter provides the Baltimore Gas and Electric Company's comments on the proposed rule to extend the implementation date of the revised 10 CFR Part 20, "Standards for Protection Against Radiation," in response to the Federal Register notice of May 19, 1992 (57 FR 21216).

We support adoption of the proposed rule by the NRC. Changing the required implementation date to January 1, 1994 will better assure correct, effective and efficient implementation of the revised Part 20. It will provide adequate time for licensees to examine and implement the new and revised regulatory guides. The proposed extension will support the development of more effective training for industry radiation workers on the new implementing requirements. We endorse the comments submitted by Nuclear Management and Resources Council.

Should you have any questions regarding this matter, we will be pleased to discuss them with you.

Very truly yours,

GCC/JMO/dlm

cc: D. A. Brune, Esquire  
J. E. Silberg, Esquire  
R. A. Capra, NRC  
D. G. McDonald, Jr., NRC  
T. T. Martin, NRC  
P. R. Wilson, NRC  
R. I. McLean, DNR  
J. H. Walter, PSC

9206290016

DOCKET NUMBER  
PROPOSED RULE **PR 19220**  
(57 FR 21216)

(30)

(31)

**BOSTON EDISON**

Pilgrim Nuclear Power Station  
Rocky Hill Road  
Plymouth, Massachusetts 02360

DOCKETED  
USNRC

'92 JUN 25 P5:33

**PDR**  
**AE21-2**

**Roy A. Anderson**

Senior Vice President - Nuclear

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

BEC0 92-065

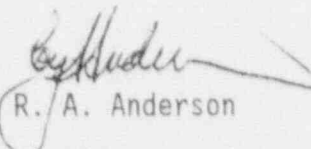
June 24, 1992

Mr. Samuel J. Chilk  
Secretary,  
U. S. Nuclear Regulatory Commission  
Washington, DC 20555

Boston Edison Comments on Proposed Rule:  
Extension of Implementation Date - 10CFR20,  
57 FR 21216, Dated May 19, 1992

Dear Mr. Chilk:

The proposed rule published in 57 FR 21216, dated May 19, 1992 would extend the implementation date for the revised Standards For Protection Against Radiation (10CFR20) from January 1, 1993, to January 1, 1994. Boston Edison Company concurs with the NRC rationale for this extension and supports the proposed rule.

  
R. A. Anderson

WGL/cab/extimp

9207130044

DOCKET NUMBER **PR 19820**  
PROPOSED RULE **(57 FR 21216)**  
PDR  
AE212  
**32**

PHILADELPHIA ELECTRIC COMPANY

NUCLEAR GROUP HEADQUARTERS

955-65 CHESTERBROOK BLVD

WAYNE, PA 19087-5691

(215) 640-6000

92 JUN 25 P4:22

NUCLEAR ENGINEERING & SERVICES DEPARTMENT

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

June 19, 1992

Mr. Samuel J. Chilk  
Secretary of the Commission  
Attn: Docketing and Service Branch  
Washington, DC 20555

Subject: Philadelphia Electric Company  
Comments Concerning NRC Proposed Rule 10 CFR 19 and 20,  
"Standards for Protection Against Radiation; Extension  
of Implementation Date (57 FR 21216)

Dear Mr. Chilk:

This letter is being submitted in response to the Nuclear  
Regulatory Commission's (NRC's) request for comments on the Proposed  
Rule 10 CFR 19 and 20, "Standards for Protection Against Radiation;  
Extension of Implementation Date," published in the Federal Register  
(57 FR 21216, dated May 19, 1992).

Philadelphia Electric Company (PECo) appreciates the opportunity  
to comment on this proposed rule to 1) extend the date for  
implementation of the revised 10 CFR 20, "Standards for Protection  
Against Radiation," from January 1, 1993, to January 1, 1994, and 2)  
make the necessary conforming change to 10 CFR 19, "Notices,  
Instructions and Reports to Workers: Inspection and Investigations."  
PECo fully supports this proposed rule, and recommends promulgation as  
a final rule. In addition, we endorse the Nuclear Management and  
Resources Council's (NUMARC's) position and comments regarding this  
proposed rule.

If you have any questions, please do not hesitate to contact us.

Very truly yours,

*G. J. Beck*  
G. J. Beck  
Manager  
Licensing Section

9207130041

40



DOCKET NUMBER  
PROPOSED RULE **PR** 19820  
(57 FR 21216)

Pacific Gas and Electric Company

77 Beale Street  
San Francisco, CA 94106  
415/973-4684

Gregory M. Rueger  
Senior Vice President  
General Manager  
Nuclear Power Generation

(32)  
(33)  
PDR

June 24, 1992

'92 JUN 29 P5:24 AE21-2

PG&E Letter No. DCL-92-143

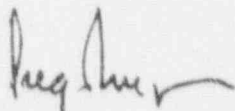
Secretary of the Commission  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Re: Docket No. 50-275, OL-DPR-80  
Docket No. 50-323, OL-DPR-82  
Diablo Canyon Units 1 and 2  
Comments Regarding Extending the Proposed 10 CFR 20 Revision  
Implementation Date to January 1, 1994

Gentlemen:

Pacific Gas and Electric Company (PG&E) has reviewed and supports the NRC's proposal to change the implementation date to January 1, 1994 of the revised 10 CFR 20, Standards for Protection Against Radiation. Allowing an additional year for implementation will give PG&E, and other nuclear utilities, the necessary time to assure that the transition from the present rules to the new rules is made in an orderly and effective manner. It will provide adequate time for licensees to examine the new and revised regulatory guides that are still being developed to clarify key concepts of the revised Part 20 and to develop or revise their regulation compliance capability based on this guidance.

Sincerely,



Gregory M. Rueger

cc: John B. Martin  
Harry Rood  
John Schmitt, NUMARC  
Diablo Distribution

5788S/85K/DWO/2225



2207130040



PROPOSED RULE PR 19220 (33) (34)  
(57FR21216)

DEPARTMENT OF THE AIR FORCE  
HEADQUARTERS AIR FORCE OFFICE OF MEDICAL SUPPORT  
BROOKS AIR FORCE BASE, TEXAS 78235-5000

PDR  
COMPLETED  
USNRC  
→ AE21-2  
92 JUN 30 P3:47

24 JUN 1992

REPLY TO  
ATTN OF:

SGPR

SUBJECT:

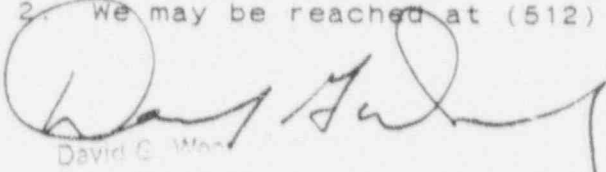
Standards For Protection Against Radiation; Extension of  
Implementation Date, Federal Register, Vol 57, No. 97, Tuesday,  
May 19, 1992 - Proposed Rules

TO:

Secretary, U.S. Nuclear Regulatory Commission  
ATTN: Docketing and Service Branch  
Washington DC 20555

1. The USAF Radioisotope Committee supports and encourages an  
extended implementation date for the revised standards of  
protection against radiation.

2. We may be reached at (512) 536-3331.

  
David G. Wain  
Executive  
USAF Radioisotope  
Office of the Secretary

cc: HQ USAF/SGP

9207130036

42

DUPLICATE NUMBER  
PROPOSED RULE  
NORA A. NICHOLSON  
10708 HEAVENWOOD COURT  
SPOTSYLVANIA, VIRGINIA 22553

PR 19420  
657 FR 21216

PDR  
(35)

June 18, 1992

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USARC  
→ AE21-2  
92 JUL -7 A11:08

U.S. Nuclear Regulatory Commission  
Office of Nuclear Regulatory Research  
Washington, D.C. 20555

Attn: Dr. Donald A. Cool  
Chief, Radiation Protection and Health Effects Branch  
Division of Regulatory Research

Re: Federal Register Notice; Vol. 57, No. 97, 05/19/92  
Extension of Implementation Date for Revised 10CFR20

Dear Dr. Cool:

I support the proposal in the above Federal Register Notice to extend implementation of the revised 10CFR20 to January 1, 1994. In addition to the justification presented in the above notice, the following comments are given to support the extension.

- Final versions of regulatory guidance - including the Regulatory Guides and I & E responses to Questions and Answers - are necessary to develop a radiation protection program to provide safe and effective implementation of the revised 10CFR20. This guidance would provide direction on unresolved technical and programmatic issues generated by the revised 10CFR20. Adequate lead time to complete this development, as would be provided by the extension to January 1, 1994, is necessary, since release of the final drafts of the Regulatory Guides is scheduled for late June 1992.
- The additional year is necessary to develop and implement computerized dose tracking systems to support requirements of the revised 10CFR20, particularly the final versions of Forms 4 and 5, which are scheduled for release late June 1992, with the Regulatory Guides.
- A steam generator replacement outage at the commercial nuclear power station where I am employed is scheduled for January 1, 1993. If the implementation date remained as January 1, 1993, efficient and safe implementation of the revisions during this outage would add significant stress on radiation protection program resources. The station and radiation protection staffs would be operating under not-yet-familiar regulations during high level work activities associated with steam generator removal and replacement. Compounding this transition would be the influx of hundreds of contractors as temporary outage support personnel who have to be trained on the revisions, processed in accordance with the new dose assessment methodologies of the revisions and be provided with jobsite or on-site health physics coverage and practices in accordance with the revisions. The extension to January 1, 1994 would permit completion of this scheduled outage and further development of the radiation protection program as noted in the above two comments.

9207130035

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- The implementation date for the revised EPA Protection Action Guides is January 1, 1994. The dose assessment methodology for the revised PAGs is similar to that of the revised 10CFR20. However, it is my understanding the NRC staff has not yet developed evaluation/inspection criteria for implementation of the PAGs. Extending the implementation date for the revised 10CFR20 would further support the consistent and parallel development of dose methodology for both the radiation protection and emergency preparedness programs.

To reiterate, I support the proposal for the extension which would provide more time for licensees to develop a radiation protection program that promotes complete and safe implementation of the revisions. Your consideration of my comments is sincerely appreciated. If you need further elaboration on the above, please contact me at (703) 8942419.

Sincerely,

*Nora Nicholson*

Nora A. Nicholson, CHP

NAN/waj

cc: A. H. Stafford  
L. B. Jones  
D. L. Horn  
C. A. Tarantino

U. S. NRC  
Attention: J. Wigginton  
Inspection & Enforcement  
Washington, D.C. 20555



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

August 25, 1992

~~for file~~  
# 36 PDR  
AC 21-2

The Honorable Bob Graham, Chairman  
Subcommittee on Nuclear Regulation  
Committee on Environment and Public Works  
United States Senate  
Washington, D. C. 20510

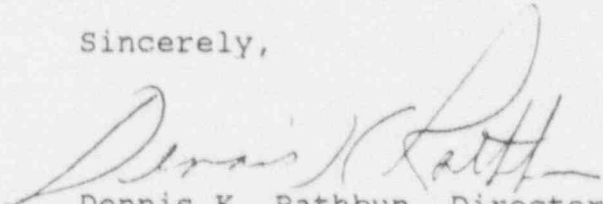
Dear Mr. Chairman:

The Nuclear Regulatory Commission (NRC) is sending the enclosed amendment to 10 CFR Part 20 to the Office of the Federal Register. The amendment extends the date by which NRC licensees are required to implement the revised standards for protection against radiation contained in 10 CFR 20.1001-20.2401 from January 1, 1993 to January 1, 1994. Extending the implementation date by one year provides licensees additional time to examine and implement the regulatory guidance. It also establishes a concurrent implementation date for NRC licensees and Agreement States, eliminating the one year period during which Agreement States could continue to enforce the existing Part 20 while the NRC would be enforcing the revised standards for protection against radiation.

This administrative action does not place additional requirements on current licensees.

The amendment will be published in the Federal Register and will become effective 30-days after publication.

Sincerely,

  
Dennis K. Rathbun, Director  
Office of Congressional Affairs

Enclosure:  
As Stated

cc: Senator Alan K. Simpson

9216710080 44

The Honorable Bob Graham, Chairman  
Subcommittee on Nuclear Regulation  
Committee on Environment and Public Works  
United States Senate  
Washington, DC 20510

Dear Mr. Chairman:

*replied in OCA*

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Sincerely,

Dennis K. Rathbun, Director  
Office of Congressional Affairs

Enclosure:  
As stated

cc: Senator Alan K. Simpson

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\*See previous concurrence

OFFC:RPHEB:DRA\*  
NAME:CTrottier  
DATE:07/21/92

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07/22/92 07/23/92

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BMorris CJHelmes  
7/27/92 7/27/92

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NAME:EBeckjord  
DATE:7/27/92

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JSneizek DRathbun  
/ /92 / /92

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The Honorable Bob Graham, Chairman  
Subcommittee on Nuclear Regulation  
Committee on Environment and Public Works  
United States Senate  
Washington, DC 20510

Dear Mr. Chairman:

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Sincerely,

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Office of Congressional Affairs

Enclosure:  
As stated

cc: Senator Alan K. Simpson

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PLarkins



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555

PDR #37

AE21-2

August 25, 1992

The Honorable Philip Sharp, Chairman  
Subcommittee on Energy and Power  
Committee on Energy and Commerce  
United States House of Representatives  
Washington, D. C. 20515

Dear Mr. Chairman:

The Nuclear Regulatory Commission (NRC) is sending the enclosed amendment to 10 CFR Part 20 to the Office of the Federal Register. The amendment extends the date by which NRC licensees are required to implement the revised standards for protection against radiation contained in 10 CFR 20.1001-20.2401 from January 1, 1993 to January 1, 1994. Extending the implementation date by one year provides licensees additional time to examine and implement the regulatory guidance. It also establishes a concurrent implementation date for NRC licensees and Agreement States, eliminating the one year period during which Agreement States could continue to enforce the existing Part 20 while the NRC would be enforcing the revised standards for protection against radiation.

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Sincerely,

A handwritten signature in dark ink, appearing to read "Dennis K. Rathbun", is written over a large, stylized, light-colored mark that resembles a large "R" or a signature.

Dennis K. Rathbun, Director  
Office of Congressional Affairs

Enclosure:  
As Stated

cc: Rep. Carlos Moorhead

9210210080

The Honorable Philip R. Sharp, Chairman  
Subcommittee on Energy and Power  
Committee on Energy and Commerce  
United States House of Representatives  
Washington, DC 20515

Dear Mr. Chairman:

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Sincerely,

Dennis K. Rathbun, Director  
Office of Congressional Affairs

Enclosure:  
As stated

cc: Representative Carlos J. Moorhead

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\*See previous concurrence

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Subcommittee on Energy and Power  
Committee on Energy and Commerce  
United States House of Representatives  
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Office of Congressional Affairs

Enclosure:  
As stated

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UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

PDR # 38

AE21-2

August 25, 1992

The Honorable Peter Kostmayer, Chairman  
Subcommittee on Energy and the Environment  
Committee on Interior and Insular Affairs  
United States House of Representatives  
Washington, D. C. 20515

Dear Mr. Chairman:

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Sincerely,

Dennis K. Rathbun, Director  
Office of Congressional Affairs

Enclosure:  
As Stated

cc: Rep. John J. Rhodes

9210210080

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Committee on Interior and Insular Affairs  
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Office of Congressional Affairs

Enclosure:  
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Committee on Interior and Insular Affairs  
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Office of Congressional Affairs

Enclosure:  
As stated

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TRTR  
NATIONAL ORGANIZATION OF  
TEST, RESEARCH, AND TRAINING REACTORS

# 475 TRR  
RE-21-3  
Executive Committee

J. Charles McKibben, Chairman  
Associate Director  
Research Reactor Facility - MURR  
University of Missouri-Columbia  
Columbia, Missouri 65211  
(314) 892-4211 FAX [314] 882-6360

John A. Bernard, Massachusetts Institute of Technology  
David D. Clark, Cornell University  
Arthur G. Johnson, Oregon State University  
Tawfik M. Raby, National Institute of Standards and Technology  
Junaid Razvi, General Atomics  
Wade J. Richards, McClellan Air Force Base  
William G. Vernetson, University of Florida, Chairman Elect  
Marcus H. Voth, Pennsylvania State University

November 22, 1991

Dr. Ivan Selin, Chairman  
US Nuclear Regulatory Commission  
Washington, DC 20555

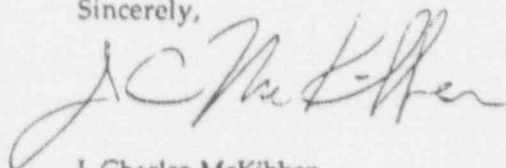
Dear Chairman:

The National Organization of Test, Research, and Training Reactors (TRTR) respectfully requests that the implementation of the revised 10 CFR 20, "Standards for Protection Against Radiation" be deferred until at least January 1994. Our reason for this request is that guidance on the incorporation of the revised regulations is still in preparation by both NRC and the ANS-15 Standards Committee. Furthermore, even if guidance were to become available quickly, it would be difficult for many facilities with limited staffing to institute major changes in such short interval of time. It is our understanding that the nuclear utilities have made a similar request through NUMARC.

The changes in 10 CFR 20 were extensively discussed at the TRTR meeting that was held at MIT 23-25 October of this year. Presentations were given by representatives of both NRC and the non-power reactor community. From the discussion that followed, it was evident that the non-power reactor community is moving aggressively to incorporate the revised standards in existing programs. However, there were many questions of interpretation regarding the new regulations and, as a result, the TRTR Executive Committee concluded that a deferment in the implementation date would be desirable. The possibility of such a delay was noted at the TRTR meeting and members were urged that, should a delay be granted, the additional time be used for trial runs of the revised programs.

Thank you for your consideration on this matter.

Sincerely,



J. Charles McKibben  
Chairman, TRTR

JCM:bsj

xc: K. Rogers, Commissioner  
J. Curtiss, Commissioner  
F. Remick, Commissioner  
TRTR Executive Committee

Document Control Desk  
J. Taylor, Executive Director  
S. Weiss, NRR/PDNP

9/11/2007 3

45



TRTR

NATIONAL ORGANIZATION OF  
TEST, RESEARCH, AND TRAINING REACTORS

#446  
PDR  
AED  
Executive Committee

John A. Bernard, Chairman  
Director of Reactor Operations  
Nuclear Reactor Laboratory  
Massachusetts Institute of Technology  
138 Albany Street  
Cambridge, MA 02139  
(617)253-4202 FAX (617)253-7300

Thomas L. Bauer, University of Texas  
David D. Clark, Cornell University  
A. Francis DiMeglio, R.I. Atomic Energy Commission  
Donald E. Feltz, Texas A & M University  
Arthur G. Johnson, Oregon State University  
J. Charles McKibben, University of Missouri, Chairman Elect  
Tawfik M. Raby, National Institute of Standards and Technology  
Marcus H. Voth, Pennsylvania State University

November 4, 1991

Mr. James M. Taylor  
Executive Director for Operations  
U.S. Nuclear Regulatory Commission,  
Mail Stop 17 G21  
Washington, D.C. 20555

Dear Mr. Taylor,

I'm writing to you for three reasons. First, as you may recall from our meeting last winter, you approved continuation of the NRC's Non-Power Reactor Seminar at the annual meeting of the National Organization of Test, Research, and Training Reactors. The seminar was held on 23 October of this year and it was an outstanding success. It brought members of the non-power reactor community together with NRC Headquarters and NRC Regional Personnel thereby affording us all a very useful exchange of views. Also, an enormous amount of high quality regulatory information was made available in a very concise format. This seminar was extremely effective and I hope that NRC will continue to support it in future years. Although I have congratulated the responsible parties in a separate letter, let me again mention them: Theodore Michaels, Marvin Mendonca, Alexander Adams, and Seymour Weiss. Incidentally, we had a record attendance at the meeting with 160 participants including representatives from practically all TRTR facilities.

A second reason for writing is to follow up on a suggestion made by Commissioner Rogers. He was the featured speaker at the NRC Non-Power Reactor Seminar. In his address, Commissioner Rogers spoke of the NRC inspection program established for non-power reactors which features strong oversight by NRC Headquarters. This is part of the overall program initiated by you and approved unanimously by the Commission and which also resulted in the creation of a separate non-power reactor directorate. Following his talk, Commissioner Rogers met with representatives of the group (myself, Tawfik Raby of NIST, Marcus Voth of Penn State, and Charles McKibben of Missouri-Columbia). The first item on our agenda was to inform the Commissioner that the non-power reactor community felt, on the whole, that they are being treated fairly. This is due in large measure to the efforts of the non-power reactor directorate and its Director, Dr. Weiss. As a result there has been a remarkable improvement in the regulatory process including a new and positive attitude by some of the regions towards NRC inspections. At the same time, TRTR members have moved diligently to improve and upgrade their operation. Clearly, this entire program has been highly successful. The Commissioner, in turn, suggested that we communicate this message to you directly. In this regard, we want to emphasize our support for NRC's current approach to the regulation of non-power reactors (NPRs). In particular, the balance that now exists between the Regions and Headquarters seems near optimal. The role of Headquarters in providing oversight and guidance to the Regions and in participating in and reviewing regional inspections ensures uniformity and fairness of the inspection process. Also, dedicated inspections by trained and knowledgeable individuals within the Regions has been highly effective. It is vital that the present arrangement and the strong management support of the non-power reactor directorate continue.

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Another aspect of NRC operation that we find to be of particular benefit is the training course on NPR inspections that is now conducted on a regular basis at NRC's facility in Chattanooga. I had the opportunity to address those taking the course this year and to sit in on some of the lectures. I thought that it was quite well done. (The directions I was given to locate the NRC building in Chattanooga are another matter, but being from Boston, I can't really complain about confusing highways.)

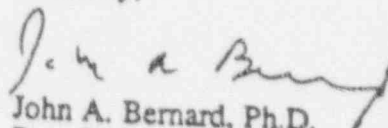
Other trends that we feel to be of value are the decision by the Regional Administrators to go to announced inspections and the assignment of a single individual to inspect NPRs on at least several consecutive occasions. This promotes consistency and also the prompt resolution of any open items.

Commissioner Rogers also spoke to the need for TRTR to do more in the way of internal review. This is an on-going challenge for us because of limited resources and the desire that TRTR not become a regulator. TRTR is committed to helping any member that requests internal assistance. An example is the peer review conducted during the past year at UC-Irvine. TRTR also tries through its newsletter and national meeting to promote information exchange on both regulatory and operational problems. For example, the newsletter editor regularly summarizes inspection reports so that all will benefit from any given finding. We are continuing to explore ways whereby TRTR can optimize its role in this regard.

My third reason for writing is to inform you of my successor as TRTR Chairman. The Chairmanship changes annually and the incoming Chairman is Mr. J. Charles McKibben of the University of Missouri-Columbia. His phone and FAX numbers are 314-882-5204 and 314-882-6360/3443. Mr. McKibben is currently trying to arrange a meeting between a TRTR delegation and Chairman Selin. I may be a part of that delegation and, if so, hope to see you again at that time.

I have had a very rewarding year as TRTR Chairman and one of the reasons for my success was the quality of the NRC Staff at both Headquarters and the Regions. I stated this at the TRTR Meeting for Commissioner Rogers' benefit and I also wish to state it to you as NRC Executive Director of Operations. The NRC Staff is industrious, dedicated, and knowledgeable. Their integrity and commitment is never in doubt and both you and the Commission are fortunate to have them. Finally, I wish to express our gratitude for the personal attention you have given the TRTR community over the years. We believe that the process you established has been of great benefit to both NRC and TRTR. I hope that some day you will be able to visit the MIT Research Reactor. This invitation is always open to you and members of your staff.

Sincerely,

  
John A. Bernard, Ph.D.  
Past-Chairman, TRTR

JAB/gw

cc: TRTR Executive Committee  
Document Control Desk, NRC  
S. Weiss, NRC, NRR/PDNP  
Commissioner Curtiss, NRC  
Commissioner Remick, NRC  
Commissioner Rogers, NRC  
Chairman Selin, NRC