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5000 Dominion Boulevard  
Glen Allen, Virginia 23060

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VIRGINIA POWER

November 30, 2000

GL00-048

Ms. Annette Vietti-Cook  
Secretary of the Commission  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001

Attention: Rulemakings and Adjudications Staff

**REQUEST FOR COMMENT ON PROPOSED AMENDMENTS TO  
10 CFR PARTS 34, 36 AND 39**

Dear Ms. Vietti-Cook:

Virginia Power appreciates the opportunity to comment on the proposed amendment to regulations that govern radiological safety, which appeared in the Federal Register, Vol. 65, No. 206, on October 24, 2000, page 63753. Although this letter is submitted after the deadline of November 24, 2000, consideration of the comment below is requested, if that is feasible.

It is recommended that the last sentence in paragraph 34.47 (a) be modified to require the use of an alarming ratemeter, for the following reason.

Radiographers and radiographers' assistants should wear an alarming ratemeter at permanent radiography installations, even if area alarming or warning devices are in use. The radiation field from a radiography source can be very localized and non-uniform; area monitors may not reflect this changing field of exposure where a radiographer and/or radiographer's assistant is working.

Template = SECY-067

SECY-02

If you would like further information, please contact either:

Nora Nicholson      Nora\_Nicholson@dom.com or (540) 894-2071

Don Olson            Don\_Olson@dom.com or (804) 273-2830

Respectfully,

A handwritten signature in black ink, appearing to be 'S.P. Sarver', written in a cursive style.

S.P. Sarver, Acting Manager  
Nuclear Licensing and Operations Support