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(66FR 36502)

A Edward Scherer  
Manager of Nuclear  
Oversight and Regulatory Affairs

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DOCKETED  
USNRC

September 26, 2001

September 28, 2001 (3:32PM)  
OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

The Secretary of Commission  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

Subject: **Revision of the Skin Dose Limit,  
Federal Register Notice Volume 66, No. 134**

Gentlemen:

Southern California Edison supports the proposed revision of the skin dose limit. The proposed rule increases overall worker safety and is based on sound science. The proposed rule is an improvement over existing regulations and the previous rulemaking plan because it permits reduction in whole body dose associated with frequent monitoring for discrete radioactive particle contamination. The rule has a minimal economic impact because no changes to current reporting practices are required. The rule provides a uniform and consistent method for monitoring occupationally exposed individuals.

The NRC proposal changes the method of calculating shallow dose equivalent by assigning the dose averaged over the 10 square centimeters of skin receiving the highest dose rather than over 1 square centimeter. According to the National Council on Radiation Protection and Measurements' Report No. 130, the practice of averaging dose over 1 square centimeter was overly restrictive. The result was a disproportionate emphasis on protecting workers against skin dose from discrete radioactive particle contamination that had little or no safety significance. The unintended consequence was inefficient work practices in discrete radioactive particle contamination areas. Inefficient work practices included stopping work-in-progress to perform frequent contamination surveys of a worker's protective clothing and prescribing multiple layers of protective clothing that increased heat stress and lowered worker efficiency.

As a result, Southern California Edison supports the proposed revision of the skin dose limit.

Sincerely,

A handwritten signature in black ink, appearing to read "A. Scherer".