

From: Peter Tam
To: INTERNet:dosaj@nimo.com; INTERNet:leonardm@nimo.com;
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Date: 4/30/02 10:41AM
Subject: Proposed RAI re. proposed RETS amendment **(TAC MB2442)**

John:

After our telecon of 4/10/02, we revised our comments on your application. We propose to issue these revised comments (below in *italics*) as an RAI:

(1) *Proposed Technical Specifications (TS) 6.12.1.d.1*

Please provide justification for the use of the underlined words "radiation monitoring and indicating device" in lieu of the words "[a] radiation monitoring device that continuously displays radiation dose rates in the area" as provided in NUREG-1433, "Standard Technical Specifications for General Electric Nuclear Plants, BWR/4 and BWR/6," Revision 1.

(2) *Proposed TS 6.12.1.d.2*

Provide justification for the use of the underlined words "alarming dosimeter" in lieu of the words "[a] radiation monitoring device that continuously integrates the radiation dose rates in the area and alarms when the device's dose alarm setpoint is reached," as provided in NUREG-1433, Revision 1.

(3) *Proposed TS 6.12.1.d.4(b)*

The NRC has provided guidance in NUREG-1433, Revision 1, to licensees on acceptable methods to control access to high radiation areas in lieu of the requirement in subpart G of 10 CFR Part 20. Section 5.7.2.c of NUREG-1433 states that "An individual qualified in radiation protection procedures with a radiation dose rate monitoring device, who is responsible for providing positive control over the activities within the area...."

In addition, Regulatory Guide 8.38, "Control of Access to High and Very High Radiation Areas in Nuclear Power Plants," Section B.1.4, provides the following guidance:

"Good communication is essential among all departments concerned with entry into high and very high radiation areas to prevent excessive and unwarranted radiation exposures."

"The access control program should include procedures and provision for the use of equipment to ensure adequate communication."

Please provide information (procedures, administrative controls, etc.) demonstrating that "positive control within the area" is maintained.

(4) *Proposed TS 6.12.2.a and TS 6.12.2.1.2*

NUREG-1433, Revision 1, Section 5.7.2 provides this guidance "....areas with radiation levels 1000 mrem/hr shall be provided with locked or continuously guarded doors...."

It is the NRC staff's regulatory position that the word "continuously" be inserted in the proposed TS.

If you want, we can have another telecon to discuss these revised comments. Please tell me what you want us to do with these comments. Thanks.

Peter S. Tam, Senior Project Manager
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