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DOCKET NUMBER  
PETITION RULE FOR 20-25  
(68FR 23618)

July 16, 2003

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DOCKETED  
USNRC

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

July 18, 2003 (12:26PM)

OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

ATTENTION: Rulemakings and Adjudications Staff

Subject: VIRGIL C. SUMMER NUCLEAR STATION  
DOCKET NO. 50/395  
OPERATING LICENSE NO. NPF-12  
SANDER C. PERLE, ICN WORLDWIDE DOSIMETRY SERVICE, et. Al.;  
RECEIPT OF PETITION FOR RULEMAKING (68 FEDERAL REGISTER NO. 86  
MAY 5, 2003) REQUEST FOR COMMENTS

South Carolina Electric & Gas Company (SCE&G) has reviewed the above subject Petition for Rulemaking. In regards to the petition, SCE&G acknowledges the importance of having an accredited program such as the National Voluntary Laboratory Accreditation Program (NVLAP) for dosimeters utilized for records of dose, however SCE&G does not agree that all dosimeters should be required to be processed and evaluated by a dosimetry processor accredited by NVLAP. It is very seldom that electronic dosimeters or personal ionization chambers are used as dose of record by SCE&G. The cost of accreditation does not warrant the benefit of having all dosimeters processed and evaluated by a dosimetry processor accredited by NVLAP in those seldom times.

Should you have any questions, please call Ms. Susan B. Reese at 803-345-4591 at your convenience.

Very truly yours,

Stephen A. Byrne

SBR/SAB/sr

c: N. O. Lorick  
N. S. Carns  
T. G. Eppink  
R. J. White  
L. A. Reyes  
K. R. Cotton  
NRC Resident Inspector

K. M. Sutton  
L. Hendricks  
NSRC  
RTS (O-C-03-1868)  
File (811.02)  
DMS (RC-03-0139)