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

July 16, 2003

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 (0-C-03-1868)
- File (811.02)
- DMS (RC-03-0139)