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July 23, 2003 (9:30AM)

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

July 16, 2003

DOCKET NUMBER:
PETITION FILE NO. 20-25
(68FR 23618)

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

GL03-020

ATTN: Rulemakings and Adjudications Staff

**SANDER C. PERLE, ICN WORLDWIDE DOSIMETRY SERVICE,
RECEIPT OF PETITION FOR RULEMAKING**

Virginia Electric and Power Company (Dominion) and Dominion Nuclear Connecticut, Inc. (DNC) appreciate the opportunity to comment on the proposed rule presented in the Federal Register, Volume 68, Number 86, Pages 23618-23620 on May 5, 2003.

We do not agree with the petitioner's request that the NRC amend its regulations in 10 CFR Part 20 to require that all dosimeters used to determine the radiation dose of record and demonstrate compliance with the dose limitations specified in the Commission's regulations be processed and evaluated by a dosimetry processor holding personnel dosimetry accreditation from the National Voluntary Laboratory Accreditation Program (NVLAP) of the National Institute of Standards and Technology. We also do not agree with the petitioner's request that the definition of individual monitoring devices (individual monitoring equipment) be revised to include "electronic dosimeters" and "optically stimulated dosimeters" as examples of certain devices for the assessment of dose equivalent or to comply with 10 CFR Part 20.1202.

At Dominion, we issue Thermoluminescent Dosimeters (TLDs) to individuals to meet the conditions requiring individual monitoring according to 10 CFR Part 20. The TLDs are considered personnel dosimeters that must be processed and evaluated by a dosimetry processor holding current dosimetry accreditation from NVLAP to meet the requirements of 10 CFR Part 20.1501. TLDs are routinely read on a quarterly basis to determine an individual's dose for the monitoring period. In addition to TLDs, individuals are also issued Electronic Dosimeters (EDs), a common practice in the nuclear power industry. EDs are considered control devices (i.e., provide real time exposure information useful in controlling worker exposures, work activities, maintaining exposures ALARA, etc.). EDs are used in the same manner as direct and indirect reading pocket ionization chambers exempted from processing in 10 CFR Part 20.1501. Used as control devices, EDs should not be considered personnel dosimeters that must be processed and evaluated by a NVLAP accredited processor. On occasion, ED dose

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SECY-02

may be used to meet 10 CFR 20 requirements (e.g., individual loses TLD). These situations are infrequent and do not warrant the need and costs associated with NVLAP accreditation of EDs. Amendment of the regulations as requested by the petitioner could have a negative effect. Licensees might elect to discontinue the practice of redundancy in issuing both TLDs and EDs opting to issue only one NVLAP accredited dosimeter. Redundancy is useful in identifying and resolving exposure discrepancies or assigning dose from lost dosimetry.

If you would like further information, please contact either:

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Respectfully,



Chris L. Funderburk, Director
Nuclear Licensing & Operations Support