

11/11/03  
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8:45 am *[Signature]*



D. R. Woodlan, Chairman  
Integrated Regulatory Affairs Group  
P.O. Box 1002, Glen Rose, Texas 76043

Ref: 68 FR 43769

STARS-03027

October 24, 2003

Chief, Rules and Directives Branch  
Division of Administrative Services  
Office of Administration (Mail Stop T6-D59)  
U. S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

7/24/03  
68 FR 43769  
*(6)*

**STRATEGIC TEAMING AND RESOURCE SHARING (STARS)  
COMMENTS ON "PROPOSED GENERIC COMMUNICATION -  
METHOD FOR ESTIMATING EFFECTIVE DOSE EQUIVALENT FROM  
EXTERNAL RADIATION SOURCES USING TWO DOSIMETERS  
(68 FR 43769 of July 24, 2003)**

Gentlemen:

The Strategic Teaming and Resource Sharing (STARS)<sup>1</sup> nuclear power plants support the comments provided by the Nuclear Energy Institute (NEI), contained in their letter dated September 23, 2003, on the proposed Regulatory Issue Summary (RIS) to provide guidance on an approved two-dosimeter monitoring method for estimating effective dose equivalent (EDE) from external exposures.

We believe that use of the EDE for whole body dose to individuals represents a more risk-based quantity than the deep-dose equivalent (DDE). We support the suggestion by NEI that the NRC confirm an effective and efficient process (or processes) whereby technical methods for estimating the EDE by use of one or more dosimeters can be proposed by licensees (or others), reviewed and approved by the NRC for general use, and generically communicated to all licensees. Our support also includes the suggestion that the NRC allow licensees, on a voluntary basis, to obtain approval for generic calculational methods for estimating the EDE. We understand that research is being completed that is intended to help resolve the 30 cm distance limitation that is currently applied by the NRC to the two-dosimeter method described in the proposed RIS. We also believe this to be important and concur with the encouragement from

<sup>1</sup> STARS is an alliance of six plants (eleven nuclear units) operated by TXU Energy, AmerenUE, Wolf Creek Nuclear Operating Corporation, Pacific Gas and Electric Company, STP Nuclear Operating Company and Arizona Public Service Company.

E-RIDS = ADM-03

Callaway • Comanche Peak • Diablo Canyon • Palo Verde • South Texas Project • Wolf Creek

Template = ADM-013

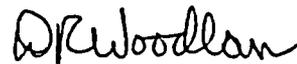
Call = C. Petrone (CDP) - S. Sherbini (SR2)  
R. Pedersen (RFP1)

NEI that review of the research be expedited when it becomes available and, to the extent that is technically justified, to reduce or eliminate the distance limitation.

Finally, we would like to comment that without more definitive guidance (such as a Regulatory Guide), there may be concerns about potential impacts that the two dosimeter method of assessing EDE may have on the measurements of lens dose equivalent (LDE) and skin dose equivalent (SDE). Guidance in this area would ensure consistent application among licensees and aid in change management processes to maintain worker confidence. We feel that this is a related issue that should be addressed out side of the current efforts to issue the RIS on EDE. We look forward to working with other utilities, the NRC and industry groups such as NEI and EPRI to resolve these and other issues that may develop as part of the implementation process.

The STARS plants appreciate the opportunity to comment on the proposed rule. If there are any questions regarding these comments, please contact me at 254-897-6887 or dwoodla1@txu.com.

Sincerely,



D. R. Woodlan, Chairman  
Integrated Regulatory Affairs Group  
STARS