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On behalf of BWXT, NPD, License SNM-42, the following comments are submitted in response to the Proposed Rules published in the Federal Register, Vol. 69, No. 36.

1st change – Change to requirement to advise workers of annual dose.

NPD supports the change. This modification would have a minimal impact on NPD operations, and would result in minimal cost savings. In regard to the suggestion to periodically notify workers of their right to request dose reports, NPD feels this is already covered in routine training, and does not believe an additional requirement for notification would increase worker safety, and would increase the burden of maintaining documentation of these notifications.

3rd change – Determination of prior occupational dose.

NPD supports the change. This modification would have minimal impact on NPD, but would result in cost savings through reduction of overhead time and paperwork tracking. NPD does not utilize the PADS system as part of routine operations. NPD believes that this change maintains adequate worker protection.

4th change – Change in TEDE definition.

NPD supports the change. This modification would have minimal impact on current operations, as NPD currently uses personal monitoring devices to determine the deep dose equivalent.

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