



State of New Jersey

Department of Environmental Protection
Division of Environmental Safety and Health
Radiation Protection and Release Prevention Element
PO Box 415
Trenton, New Jersey 08625-0415
Tel (609) 984-5520

Bradley M. Campbell
Commissioner

Richard J. Codey
Acting Governor

January 11, 2005

U.S. Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

Gentlemen:

Subject: Oyster Creek Nuclear Generating Station
Docket No. 50-219
Technical Specification Change Request dated October 21, 2004

AmerGen Energy Company submitted the subject change request to the Nuclear Regulatory Commission (NRC) on October 21, 2004. The proposed change, if approved, would eliminate the requirement for AmerGen to submit two reports to the NRC on an on-going basis. One report is the Annual Exposure Data Report and the second is the Monthly Operating Report.

The New Jersey Department of Environmental Protection's Bureau of Nuclear Engineering reviewed the request in accordance with the requirements of 10 CFR 50.91(b) and has the following comments. We find the Monthly Operating Report to be of little value and have no comments regarding its elimination. However, the Annual Exposure Data Report is useful and we believe the Technical Specifications should not be changed with respect to this report. This report provides positive confirmation to the public that actual radiological exposures to workers is consistently much less than regulatory limits. This is data that would be compiled by AmerGen with or without the technical specification requirement, consequently we see no significant reduction in regulatory burden by eliminating the reporting requirement. We recognize that the NRC compiles industry data and publishes it in a NUREG. Unfortunately, that information is not as timely as the data published as a result of the technical specification requirement.

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If you have any questions, please contact Rich Pinney at (609) 984-7558.

Sincerely,



Jill Lipoti, Ph. D.  
Assistant Director

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**Distribution:**

**Kent Tosch**  
**N.J. DEP**

**Dennis Zannoni**  
**N.J. DEP**

**R. Bores, Ph. D.**  
**NRC Region I State Liaison Officer**

**P. Tam**  
**NRC Project Manager**

**D. Helker**  
**AmerGen**

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