From: "Earls, Leonard" <lmearls@STPEGS.COM>
To: <NRCREP@nrc.gov>
Date: Wed, Nov 30, 2005 10:24 AM
Subject: Comments on DG-8028

10/6/05
70 FR 58490

Please find attached comments on ~~DG-8028.~~ I appreciate the opportunity to supply input.

DG-8.38

(1)

Regards,

Leonard Earls, Ph.D., CHP

RECEIVED
2005 NOV 30 PM 1:14
RULES AND DIRECTIVES BRANCH USNRC

SISP Review Complete
Template - ADM-013

E-RIDS = ADM-03
Add = H. Karagiannis (HXK)

Mail Envelope Properties (438DC415.D80 : 13 : 3456)

Subject: Comments on DG-8028
Creation Date: Wed, Nov 30, 2005 10:23 AM
From: "Earls, Leonard" <lmearls@STPEGS.COM>

Created By: lmearls@STPEGS.COM

Recipients
nrc.gov
twf4_po.TWFN_DO
NRCREP

Post Office	**Route**
twf4_po.TWFN_DO	nrc.gov

Files	**Size**	**Date & Time**
MESSAGE	135	Wednesday, November 30, 2005 10:23 AM
TEXT.htm	1760	
DG-8028.pdf	44622	
Mime.822	65153	

Options

Expiration Date:	None
Priority:	Standard
Reply Requested:	No
Return Notification:	None
Concealed Subject:	No
Security:	Standard

Comments on DG-8028

1. Page 2, last sentence: Although the language has not changed from the previous revision of this guide, the draft is defining an accessible area as one that can be reasonably occupied by a major portion of an individual's whole body. Per the 10CFR20 definition of whole body, the whole body is the "head, trunk (including male gonads), arms above the elbow, or legs above the knee." Because "**or**" is used instead of "**and**", a portion of any of these body parts is interpreted by some inspectors as a major portion of the whole body. That renders the definition of accessible useless for the licensee. Licensees are left with a practical definition of accessible that is "if any portion of the person, other than the extremities, can occupy a space, that space is considered accessible." "Reasonable" is not considered except for whether distance from the floor makes a space inaccessible.
2. Several occasions in the draft, the phrase "past experience" is used. Suggest just using "experience" since all experience is "past."
3. Page 3, §1.2.1 (7): recommend changing "placement of continuously indicating dose rate measuring instrumentation and alarming dosimeters" to "placement of alarming dosimeters." Although it is true that most electronic dosimeters have a dose rate function built in, the electronic dosimeter display is typically set to show dose accrued. The phrase "continuously indicating dose rate measuring instrumentation" is more typically applicable to survey meters. For these, placement is not the issue. Taken literally as written, the regulatory guide seems to be requiring electronic dosimeter displays to be set to display dose rate rather than dose accrued.
4. Page 4, §1.5, second and third sentences: Instead of "prevent inadvertent entry" as in the current version, the draft uses what appears to be a more stringent phrase "secure the area against unauthorized access and cannot be easily circumvented." The next parenthetical sentence attempts to explain the meaning but is making the adequacy of the barrier dependent upon the psyche of the individual.

   Additionally, for nuclear plants governed by Technical Specifications for high radiation areas, the physical controls of §1.5 for high radiation areas appear to be not applicable because the recommendations of §1.5 are much more stringent than typical Technical Specification controls, §2.4. Please address the applicability of §1.5 for plants using Technical Specification controls for high radiation areas, making it clear whether §1.5 applies in these cases. For very high radiation areas, because there are no Technical Specification controls, one could assume that §1.5 would apply.

5. Page 10, §4.2 (4): The draft adds (4) Diving operations are not being conducted in the pool" as another requirement if the pool is not to be controlled as a very high radiation area. Many facilities use divers in either the spent fuel pool or the reactor cavity. Divers are sometimes physically restrained from entering areas where very high radiation levels may be encountered by use of a tether or underwater "cage". For those cases, whether or not there is a diver in the pool should not be a criterion for not controlling the pool as a very high radiation area because, due to physical restraints, the places where very high radiation levels exist are not accessible.

   The question arises as to how a pool would be controlled as a very high radiation area. Would this require the floor to ceiling fence? There are typically no keys to control. It appears that all controls would be administrative.