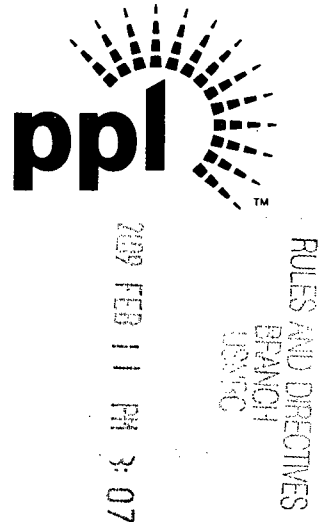


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Rulemaking, Directives, and Editing Branch
Office of Administration
U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001

**SUSQUEHANNA STEAM ELECTRIC STATION
COMMENTS ON DRAFT REGULATORY GUIDE DG-4013 Docket Nos. 50-387
PLA-6471 and 50-388**

- References: 1) *Draft Regulatory Guide DG-4013, "Environmental Monitoring for Nuclear Power Plants," dated November 2008.*
2) *Federal Register dated November 10, 2008.*

On Monday, November 10, 2008, in Vol. 73, No. 218 of the *Federal Register*, the U. S. Nuclear Regulatory Commission (NRC) published a proposed draft Regulatory Guide for comment regarding environmental monitoring for nuclear power plants. This letter provides PPL Susquehanna, LLC (PPL) comments on the draft Regulatory Guide, which are included in the attachment.

If you have any questions, please contact Mr. Jason Welch at (570) 542-3251.


W. H. Spence

Attachment: PPL comments on draft Regulatory Guide DG-4013

cc: NRC Region I
Mr. R. Janati, DEP/BRP
Mr. F. W. Jaxheimer, NRC Sr. Resident Inspector
Mr. B. K. Vaidya, NRC Project Manager

SONET Review Complete

Template = ADM-013

E-RFS = ADM-03
Add = E. O'Donnell (exo)
S. Yarry (SMB2)

Attachment to PLA-6471

Comments on Draft Regulatory Guide DG-4013

COMMENTS ON DRAFT REGULATORY GUIDE DG-4013*(Proposed Revision 2 of Regulatory Guide 4.1)*

1. Certain parts of section C.2 seem to be outside the intent or scope of a Radiological Environmental Monitoring Program. Specifically, see section 2.3.1 which lists program elements such as "TLD locations for monitoring work areas where members of the public routinely have access in the controlled area."
2. Most, if not all, licensees of operating power reactors have revised programs to comply with the NEI Groundwater Protection Initiative (GPI). The NRC, NEI and ANI will be performing inspections of each site's response to and implementation of the NEI GPI. This negates the need for all or portions of sections 2.3.2 and 2.3.3.
3. Section 2.6, 2nd paragraph includes a "recommended" LLD for tritium in ground water of 300 picocuries/liter. There is discussion of the reasoning or "intention" for the value but a basis for the 300 picocuries/liter is not provided or referenced.
4. Section 2.8.a seems to be more applicable to Reg. Guide 1.21 (radioactive effluent monitoring/control) and not for environmental monitoring.
5. The first sentence below Table 1 on page 13 should have "(a)" preceding it, if it is intended to describe the basis for the H-3 Reporting Level for water.
6. Page 13, last paragraph, first sentence; "Table 2" should be "Table 1."