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Dominion®

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Office of Administration
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

ATTN: Rulemaking, Directives, and Editing Branch

COMMENTS ON DRAFT REGULATORY GUIDE DG-8039, "METHODS FOR ESTIMATING EFFECTIVE DOSE EQUIVALENT FROM EXTERNAL EXPOSURE"

The proposed revision to Draft Regulatory Guide DG-8039, "Methods for Estimating Effective Dose Equivalent from External Exposure," describes dosimetry methods that the U. S. Nuclear Regulatory Commission (NRC) considers acceptable for determining the effective dose equivalent (EDE) for External (EDEX) radiation exposures. These methods provide a conservative estimate of the EDEX and may be used to calculate the total effective dose equivalent (TEDE) in demonstrating compliance with TEDE-based NRC regulatory requirements.

Dominion Resources Services, Inc. (Dominion) appreciates the opportunity to comment on this regulatory guide. Dominion endorses the Nuclear Energy Institute (NEI) comments that were submitted on November 19, 2009, and proffers one additional, detailed comment, which is attached for your review and consideration. If you would like further information, please contact:

Carl Tarantino Carl.Tarantino@dom.com or (804) 273-3068

Respectfully,

C. L. Funderburk, Director
Nuclear Licensing & Operations Support
Dominion Resources Services, Inc. for
Virginia Electric and Power Company,
Dominion Nuclear Connecticut, Inc. and
Dominion Energy Kewaunee, Inc.

Attachment

SUNSI Review Complete
Template = ADM-013

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

Dominion Additional Comment on Draft Regulatory Guide DG-8039, Methods for Estimating Effective Dose Equivalent from External Exposure

1. The first sentence in the "Discussion" section states that *"...10 CFR Part 20 breaks the EDE into two components: (1) dose resulting from radioactive sources internal to the body and (2) dose resulting from radioactive sources external to the body."* 10 CFR 20.1003 defines Total Effective Dose Equivalent (TEDE) as the sum of the Effective Dose Equivalent (EDE) for external exposures and the Committed Effective Dose Equivalent (CEDE) for internal exposures. While the draft Regulatory Guide correctly references 10 CFR 20 for the definition of EDE, characterization of the first component of EDE as dose resulting from radioactive sources internal to the body is misleading. It is recommended that the first sentence in the "Discussion" section be revised to state the same definition of EDE as given in 10 CFR 20. EDE is the external dose component of TEDE which includes a component derived from stochastic based weighting factors.