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Rulemaking and Directives Branch  
Office of Administration  
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U.S. Nuclear Regulatory Commission  
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74FR49895

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Subject: Comments Concerning Draft Regulatory Guide DG-8039, "Methods for Estimating Effective Dose Equivalent from External Exposure" (Federal Register Notice 74FR49895, dated September 29, 2009)

Exelon Generation Company, LLC (Exelon) is submitting this letter in response to a request from the U.S. Nuclear Regulatory Commission (NRC) for comments concerning the subject draft Regulatory Guide (RG).

DG-8039 describes dosimetry methods that the NRC considers acceptable for determining Effective Dose Equivalent for External (EDEX) radiation exposures. These methods provide a conservative estimate of EDEX and may be used to calculate Total Effective Dose Equivalent (TEDE) in demonstrating compliance with TEDE-based regulatory requirements consistent with the provisions in 10 CFR 20.1201(c). DG-8039 consolidates guidance previously published by the NRC in Regulatory Information Summary (RIS) 2002-06, RIS 2003-04, RIS 2004-01, and RIS 2009-09.

Exelon appreciates the opportunity to comment on DG-8039 and offers comments for consideration by the NRC. Section C, "Regulatory Position," of DG-8039 proposes two methods for determining EDEX radiation exposures. One method uses the criteria described in American National Standards Institute (ANSI)/Health Physics Society (HPS) standard N13.41-1997, "Criteria for Performing Multiple Dosimetry," by applying several different dosimeter results. A second method is based on research conducted by the Electric Power Research Institute (EPRI) and uses a two-dosimeter approach for determining EDEX exposures. Some licensees may already have been authorized to use the criteria described in the ANSI standard for estimating EDEX exposures. Exelon requests clarification as to whether the use of either option is acceptable, as the draft RG would imply, even if a licensee is currently authorized to use the ANSI standard criteria.

In addition, Exelon supports the comments submitted by the Nuclear Energy Institute (NEI) on behalf of the industry related to this draft RG.

If you have any questions or require additional information, please do not hesitate to contact Mr. Richard Gropp at 610-765-5557.

Respectfully,

*D. P. Helker*

David P. Helker  
Manager - Licensing

*SUNSI Report Complete  
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