

**NRCREP Resource**

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**From:** Grady Lagleder [Glagleder@ihiswt.com]  
**Sent:** Wednesday, October 14, 2009 9:08 AM  
**To:** Regs4rp Resource  
**Subject:** Comments on Reduction of Exposure Limits  
**Attachments:** Letter to NRC 10-14-09.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Please see attached comment letter regarding NRC's consideration of exposure limit reductions.  
Thank you.

Grady Lagleder  
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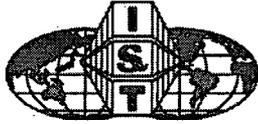
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RULES AND DIRECTIVES  
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SUNSI Review Complete  
Template = ADM-013

E-RIDS = ADM-03  
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# IHI Southwest Technologies, Inc.

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October 14, 2009

Nuclear Regulatory Commission  
Office of Public Affairs  
Washington, D.C. 21555-0001

Subject: Potential Changes to Radiation Protection Regulations

Reference: NRC News Notice No. 09-078

Dear Sir or Madam:

IHI Southwest Technologies (ISwT) is a small engineering services company that is engaged in the performance of Inservice Inspection (ISI) of nuclear power plant components. Our inspection services are typically conducted in accordance with the requirements of American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code, Section XI as endorsed by 10CFR50.55a. ISI activities consist of the performance of nondestructive examinations, predominately of reactor vessel and piping welds in the primary systems of the plants. This work is not only critical to the integrity of the components, but it is also mandated for continued operation of the plants.

We have recently become aware of the staff's effort to achieve greater alignment between the agency's radiation protection regulations and the 2007 recommendations of the International Commission on Radiological Protection (ICRP). We would like to express our concerns about the possibility of lowering the effective dose limits.

The skill levels required for personnel performing ISI activities here in the US, as well as in other countries, have increased significantly in the last few years due to various new and continuously increasing qualification requirements. This situation has already resulted in a significantly reduced qualified workforce in the ISI market and threatens to not only drive prices upwards, but potentially to also prevent some plant operators from complying with inspection requirements due the lack of a sufficient and qualified workforce.

The workforce challenges, coupled with increasing conservatism regarding the administration of current exposure limits has already impacted ISwT's (and other companies) ability to staff multiple jobs during the typical nuclear plant outage seasons over the last few years. Even though the actual current limit is 5 rem/year, it

is very common for individual plant operators (and/or their administrative personnel in the Radiation Protection departments) to adopt and implement more restrictive administrative limits of less than 2 Rem/year. This approach may work well when considering personnel that are permanently employed at the plant and rarely go inside the plant to work, but it becomes increasingly limiting for companies such as ISwT (and our employees) who may work at 8-10 different nuclear plant outages each year with a large portion of the work performed inside the plant. It is not uncommon for plants to refuse access for individuals who have received 2 Rem of exposure (40% of the current limit) prior to arrival at their plant. So if an individual is scheduled to work at 10 outages in a given year, he must basically manage his exposure at the average rate of about 200 MRem at each outage. Since many of the inspection areas are high dose because of the age of our US facilities, this is very impractical, if not impossible. That, combined with the desire by each plant to have sufficient dose available to accomplish their scheduled work, is causing increasing difficulty in our ability to manage not only the technical and staffing issues, but also the commercial issues that can surface as a result.

In summary, it is our belief at ISwT that the current exposure limits and regulations do provide adequate protection of health and safety of workers, the public, and the environment. It is also our belief that further reductions in the limits would create specific hardships within the commercial nuclear power industry. Therefore we believe that the regulations should not be subject to additional downward adjustments.

Thank you very much for your consideration of our comments and if you have any questions, please call me at 210-256-4103.

Sincerely,



Grady Lagleder  
President