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Solicitation for Public Comment on Potential Changes to the Agency's Radiation Protection Regulations

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## General Comment

South Carolina Electric & Gas Company (SCE&G) has reviewed the potential changes to the NRC's Current Radiation Protection Regulations and the 2007 Recommendations of the International Commission on Radiological Protection (ICRP) and has the following comments:

1. SCE&G agrees with the NRC's position that the current regulations provide adequate protection.
2. The recommendations should be adopted as constraints and not regulatory limits.
3. If implemented as regulatory limits, the burden to licensees would be significant. Licensees would have to consider impact to bases documents, procedures, exposure tracking software, etc. Reporting requirements that were recently changed to lessen the burden on licensees would revert back to previous requirements.
4. Declared Pregnant Workers (DPW). If the constraint/limit changes to 100 mrem (or less for the gestation period), licensees implementing INPO's 05-008 recommendation to treat workers who declare "their intent to become pregnant" the same as a DPW could face resource issues from applying the more restrictive limit. The ICRP strongly recommends that the same constraints be applied to workers who are breast feeding. The need to obtain this type of information from workers may not be well received and/or raise privacy issues for licensees.
5. Constraint vs. Limit. Overall, the industry has seen a reduction in source term and a decline in doses. Licensees have implemented more measures to maintain lower doses without enforcement. The ICRP recommendations could be used as constraints to support this effort.
6. Regulatory Guide 1.109 should be updated with new dose factor methodology.

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