



NUCLEAR ENERGY INSTITUTE

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March 25, 2010

Ms. Andrea D. Valentin
Chief, Regulatory Guide Development Branch
Division of Engineering
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Withdrawal of Regulatory Guide 8.6, "Standard Test Procedure for Geiger-Muller Counters."

Project Number: 689

Dear Ms. Valentin:

On March 17, 2010, the U.S. Nuclear Regulatory Commission (NRC) issued a *Federal Register* Notice (75 FR 12804) announcing withdrawal of Regulatory Guide 8.6, "Standard Test Procedure for Geiger-Muller Counters." Regulatory Guide 8.6 provided guidance for licensees to comply with Title 10 *Code of Federal Regulations* Part 20 (10 CFR 20) "Standards for Protection Against Radiation," specifically 10 CFR 20.201, "Precautionary Procedures: Surveys" which requires surveys, including appropriate measurements of levels of radiation. 10 CFR 20.201 has since been deleted and the subject matter is now addressed in 10 CFR 20.1501, "General," which states that licensees shall perform surveys to ensure that instruments and equipment are used for quantitative radiation measurements are calibrated periodically for the radiation measured. Since the 1970's, technology has changed and numerous other types of radiation detection and measurement instruments are used.

The Nuclear Energy Institute (NEI)¹, on behalf of the nuclear energy industry, concurs that it is not feasible for NRC to provide guidance for the testing of all radiation detection and measurement

¹ NEI is the organization responsible for establishing unified nuclear industry policy on matters affecting the nuclear energy industry, including the regulatory aspects of generic operational and technical issues. NEI's members include all utilities licensed to operate commercial nuclear power plants in the United States, nuclear plant designers, major architect/engineering firms, fuel fabrication facilities, materials licensees, and other organizations and individuals involved in the nuclear energy industry.

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instruments in use today and in the future. We, therefore, concur that Regulatory Guide 8.6 should be withdrawn because it is no longer necessary nor is it current with existing technology.

Thank you for the opportunity to comment on the withdrawal of this document. If you have any questions concerning these comments, please contact me at 202-739-8043; exa@nei.org.

Sincerely,

A handwritten signature in cursive script that reads "Ellen P. Anderson". The signature is written in black ink and is positioned below the word "Sincerely,".

Ellen P. Anderson

c: Ms. Harriett Karagiannis, RES/DE/RGDB, NRC