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RULES AND DIRECTIVES
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ATTN: Rulemaking and Directives Branch

**COMMENTS ON DRAFT REGULATORY GUIDE DG-8036,
PERSONNEL MONITORING DEVICE – DIRECT-READING
POCKET DOSIMETERS, (DATED APRIL 2010)
DOCKET ID NRC-2010-148**

Dominion Resources Services, Inc. (Dominion) appreciates the opportunity to comment on this draft regulatory guide and offers the following comments for consideration:

1. Recognizing that neutron sensitive devices, including bubble dosimeters, are referenced in the 1st paragraph of this section, it is also suggested that the limitation of these devices under hot and cold temperature conditions be added to the 2nd paragraph discussion. Specifically, the 2nd paragraph under section B on page 2 discusses some limitations of direct reading dosimeters. It is suggested that the 2nd sentence be revised to include “temperature dependent in some applications” following “...in conditions of high humidity”.
2. Regulatory position #1 discusses intervals for test and calibration of pocket dosimeters, however there is no mention of any allowance for a retest should a dosimeter fail its initial calibration. It is fairly common to have new units fail their initial calibration tests, and for those facilities still monitoring workers with SRDs, this could become expensive if the units fail after the initial test and are then rejected. Retesting would appear to be a reasonable solution.
3. Regulatory position C.3 on the recharge reset of pocket dosimeters, as currently written, is grammatically incomplete and does not reflect current industry practices for evaluating drift of dosimeter readings in the field. It is recommended that this position be revised as follows: “Licensees should charge dosimeters periodically, place them in an area of low radiation background, and examine them periodically, e.g. 1-2 days, for excessive drift. In order to maintain a reasonable level of sensitivity for monitoring radiation leaks and to ensure full scale reading capability, pocket dosimeters should be recharged or reset at the start of each shift.”

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4. Regulatory position #6 discusses the comparison of dose readings. The draft proposes investigation of differences between SRDs and TLDs that exceed 20%. The industry standard is 25% and unless there is a compelling reason to modify standard practice, 25% should remain. Furthermore, the recommendation does not distinguish between the type of radiation being monitored and the associated measurement accuracy. It is recommended that investigations be conducted for differences that are greater than 25% for gamma dose measurements and 50% for neutron dose measurements, as neutron measurements are less accurate than gamma measurements. While the industry standard is 25% for gamma dose measurement differences, it is reasonable to apply a 50% threshold for neutron dose investigations due to the high error rates associated with current technologies for these types of measurements.

5. The discussion for regulatory position #9 on mixed radiation fields should be modified to clarify the intent to use gamma dosimeters for neutron dose measurements. It is suggested that the 1st paragraph of regulatory position #9 be revised to state: "Direct reading pocket dosimeters normally used for gamma dose measurements may be used in a mixed neutron and gamma radiation field for neutron dose measurements in order to comply with personal monitoring..."

If you would like further information on our comments, please contact Mr. Carl Tarantino at (804) 273-3068 or Carl.Tarantino@dom.com.

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.