



NUCLEAR ENERGY INSTITUTE

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75 FR 18241

June 3, 2010

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RULES AND DIRECTIVES
BRANCH
USNRC

Ms. Cynthia K. Bladey
Chief, Rules, Announcements, and Directives Branch
Office of Administration
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Industry Comments on Draft Regulatory Guide, DG-8036, "Personnel Monitoring Device - Direct-Reading Pocket Dosimeters"

Project: 689

Dear Ms. Bladey:

On April 9, 2010, the U.S. Nuclear Regulatory Commission (NRC) issued a *Federal Register* Notice (75 FR18241) soliciting public comment on the draft regulatory guide DG- 8036, "Personnel Monitoring Direct-Reading Pocket Dosimeters." DG-8036 provides guidance on acceptable performance standards for personnel monitoring, as allowed by Title 10 *Code of Federal Regulations* Part 20 (10 CFR 20), which requires licensees to determine and record occupational exposures to demonstrate compliance with dose limits for adults, for an embryo/fetus, and for minors, and to supply and direct the use of individual monitoring devices. The Nuclear Energy Institute (NEI)¹ provides the enclosed comments on behalf of the nuclear energy industry on the subject draft regulatory guide.

¹NEI 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.

SUNSI Review Complete

F-REDS = ADM-03

Template = ADM-013

Add = H. Karagiannis (hkk)

Ms. Cynthia K. Bladey

June 3, 2010

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Thank you for the opportunity to comment on the document, and we look forward to reviewing the final version. 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

Enclosure

Industry Comments to DG-8036

	Issue	Citation	Comment
	Editorial	Page 1, section A, 2 nd paragraph	The word "devises" should be "devices."
	Editorial	Page 2, section B	Be consistent with the use of "x-ray"/"x-ray and "gamma-ray"/"gamma ray."
	Editorial	Page 2, Section B, 4 th paragraph	The word "detail" should be "detailed."
	Pocket dosimeter rejection	Page 3, section 2	Suggest the following wording: "The licensee must reject the dosimeter if it fails to read \pm 20 percent of the calibrated exposure from a source traceable to the National Institute of Standards and Technology <u>on two consecutive tests.</u> " (Suggested change emphasized)
	Pocket dosimeter recharge or reset	Page 3, section 3	First sentence does not make sense. We suggest the following wording: "Licensees should charge dosimeters periodically, place them in an area with a low radiation background, and examine them after two or three days for excessive drift due to charge leakage. To ensure full-scale reading capability, pocket dosimeters

	Issue	Citation	Comment
			<p>must be recharged or reset at the start of each shift so that the dosimeters will be capable of reading the dose accrued, accounting for the charge leakage that normally occurs (e.g. 40 percent of scale so that dosimeters will be capable of reading the leakage at full scale.)"</p> <p>In addition, "periodically" should be in accordance with manufacturer's recommendations. A twenty-four hour drift test will be sufficient because the next sentence has the dosimeter recharged at the start of each shift.</p>
	Environmental conditions	Page 3, section 4	Instead of "radiation free," the second sentence should read ..." low dose and cool room temperature"...
	Off-scale reading	Page 4, section 5	Suggest change in wording from "...dosimeter must be sent for processing..." to "...dosimeter should be sent for processing..."
	Comparison of dose readings	Page 4, section 6	Suggest that NRC incorporate the criteria established by the Institute for Nuclear Power Operations (INPO) and revise the wording to read as such: "Licensees should compare...and investigate the reasons for differences that are greater than 25 percent and when either device exceeds 100 mrem of accumulated exposure."