

Carl B. Corbin, Chairman  
STARS Integrated Regulatory Affairs Group  
P.O. Box 1002, Glen Rose, Texas 76043

STARS-10004

June 15, 2010

Michael T. Lesar, Chief  
Rulemaking and Directives Branch  
Office of Administration  
Mail Stop: TWB-05-B01M  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

4/09/2010  
75 FR 18241  
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RULES AND DIRECTIVES  
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USNRC

**STRATEGIC TEAMING AND RESOURCE SHARING (STARS)  
COMMENTS ON DRAFT REGULATORY GUIDE  
DG-8036, "PERSONNEL MONITORING DEVICE -  
DIRECT-READING POCKET DOSIMETERS."  
DOCKET ID NRC-2010-0148.**

Reference: 75 FR 18241, Notice of Issuance and Availability of Draft  
Regulatory Guide, DG-8036, dated April 9, 2010

Dear Mr. Lesar,

The Strategic Teaming and Resource Sharing (STARS)<sup>1</sup> alliance submits the following comments in response to the referenced Federal Register notice soliciting comments on Draft Regulatory Guide DG-8036, "Personnel Monitoring Device—Direct-Reading Pocket Dosimeters." STARS appreciates the NRC request for comments on DG-8036:

Section C.6 The new "Comparison of dose readings" section requires investigations for a TLD/OSL to PIC comparisons >20% without definition of frequency or minimum dose. This is a tighter band than the current industry standard of 25% that applies when one or the other is > or = 100 mrem. This new guidance could result in investigations for very low dose values.

<sup>1</sup> STARS consists of thirteen plants at seven stations operated by Luminant Power, AmerenUE, Wolf Creek Nuclear Operating Corporation, Pacific Gas and Electric Company, STP Nuclear Operating Company, Arizona Public Service Company, and Southern California Edison.

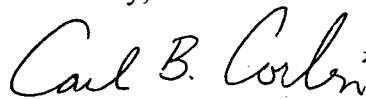
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E-RDS = ADM-03  
Add = H. Karagiannis (hxx)

Section C.1 PICs are not routinely "calibrated" in the context normally used in Technical Specifications or other standards. PICs are not adjustable if they do not meet the proper response values. They are response checked, sometimes called quality tested, to a pass or fail level. Calibration of PICs is beyond the capabilities of most users. 10 CFR 34.47(c) and NR 1556 appropriately refer to checking pocket dosimeters to response to radiation at least every 12 months. It should be clarified in Regulatory Position C.1 that the "examination" satisfies the calibration criteria.

Thank you for your consideration of these comments. If there are any questions regarding these comments, please contact me at 254-897-0121, or [carl.corbin@luminant.com](mailto:carl.corbin@luminant.com), or Dennis Buschbaum at 254-897-5851, or [dennis.buschbaum@luminant.com](mailto:dennis.buschbaum@luminant.com).

Sincerely,



Carl B. Corbin, Chairman  
STARS Integrated Regulatory Affairs Group