Response to Public Comments on Draft Regulatory Guide, DG-8035
"Administrative Practices in Radiation Surveys and Monitoring"
(Proposed Revision 1 of Regulatory Guide 8.2)

On August 30, 2010, NRC published a notice in the *Federal Register* (page 75 FR 52996) that Draft Regulatory Guide DG-8035 (Proposed Revision 1 of Regulatory Guide 8.2) was available for public comment. The public comment period ended October 29, 2010. Comments were received from the organizations listed below. NRC has combined the comments and NRC staff disposition in the following table.

ORIGINATOR	NO.	COMMENT	DISPOSITION
Nuclear Energy Institute	1	Page 1: Does the scope of this Regulatory Guide also include process (i.e., inline) monitoring?	The scope of this Regulatory Guide does not include process monitoring.
	2	Page 1, second paragraph: "10 CFR 2103" should read 10 CFR 20.2103"	The NRC staff has incorporated this comment to clarify the guidance provided.
	3	Page 2, Section C, Item a: We suggest that you reword this item to read as follows: "Ensure that the survey and monitoring program, which is usually part of the radiation <u>protection</u> program, is under management that is independent of the <u>operations department</u>, and reports directly to a sufficiently high level of the licensee's Management." (Proposed changes underlined.) Proposed changes for the following reasons: 1. Change radiation "control" program to the more contemporary name radiation "protection" program. 2. In most, if not all of the U.S. nuclear power plants, the Radiation Protection Department (which implements each plant's survey and monitoring program) is a separate department from the Operations Department; however, the Radiation Protection Department is an integral member of the plant operational organization along with the maintenance, chemistry, instrumentation and controls departments, etc.). This is contrary to the	The NRC staff has incorporated this comment in Section C, Item a, to clarify the guidance provided.

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Nuclear Energy Institute		Nuclear Oversight organization which is totally independent of the operational organization. To be most effective in implementing the radiation protection program and assuring that doses to workers are ALARA, we believe that the Radiation Protection Department should continue to operate as a member of the plant operational organization and not independent from the other members of the operational team.	
	4	Page 2, Section C, between steps b and c: Add an additional step to read as follows: "Ensure that the survey and monitoring program is designed to adequately characterize the radiological conditions and hazards."	The NRC staff has incorporated this comment in Section C, Item c to clarify the guidance provided.
	5	Page 3, Item f: Reword this step to read: "The RPM/RSO should meet the minimum requirements for education, training, and experience specified in Regulatory Guide 1.8."	The NRC staff has incorporated this comment in Section C, Item f to clarify the guidance provided.
	6	Page 3, Item m: Suggest this step to read: "Ensure survey and monitoring results are documented, maintained, and retrievable."	The NRC staff has incorporated this comment in Section C, Item m to clarify the guidance provided.
	7	Page 4, Reference 3: "ANSI N 13.2" should read "ANSI N 13.2-1969" as referenced in the Discussion section of this Regulatory Guide.	The NRC staff has incorporated this comment to clarify the guidance provided.