

Forder, Dawn

From: Bladey, Cindy
Sent: Monday, December 23, 2013 10:07 AM
To: Borges, Jennifer; Forder, Dawn
Subject: Fw: Comments on Draft Regulatory Guide DG-8031, "Monitoring Criteria and Methods to Calculate Occupational Radiation Doses"
Attachments: 12-23-13_NRC_Comments on Draft Regulatory Guide DG-8031; Docket NRC-2013-0234.pdf

From: ANDERSON, Ellen <exa@nei.org>
Sent: Mon Dec 23 09:30:25 2013
Subject: Comments on Draft Regulatory Guide DG-8031, "Monitoring Criteria and Methods to Calculate Occupational Radiation Doses"

December 23, 2013

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

Subject: Comments on Draft Regulatory Guide DG-8031, "Monitoring Criteria and Methods to Calculate Occupational Radiation Doses" (Federal Register 78 FR 64030, dated October 25, 2013; Docket ID NRC-2013-0234)

Project Number: 689

Dear Ms. Bladey:

On behalf of the nuclear energy industry, the Nuclear Energy Institute (NEI)^[1] appreciates the opportunity to provide the enclosed comments on the proposed revisions published in the subject Federal Register notice. Overall, we compliment NRC staff for a document that is comprehensive and well-written.

Please feel free to contact me at 202.739.8043; exa@nei.org should you have any questions or concerns.

Sincerely,

Ellen P. Anderson

Enclosure

Ellen P. Anderson
Senior Project Manager, Radiation Safety & Environmental Protection

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E-RIDS = ADM-03
ADD = H. Karagiannis (hxk)
D. Lewis (del1)

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¹¹¹ The Nuclear Energy Institute (NEI) is the organization responsible for establishing unified industry policy on matters affecting the nuclear energy industry, including the regulatory aspects of generic operational and technical issues. NEI's members include all entities licensed to operate commercial nuclear power plants in the United States, nuclear plant designers, major architect/engineering firms, fuel cycle facilities, nuclear materials licensees, and other organizations and entities involved in the nuclear energy industry.

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**Comments on Draft Regulatory Guide DG-8031,
"Monitoring Criteria and Methods to Calculate Occupational Radiation Doses"**

No.	Document/Page-Section	Comments
1.	Page 2 – Related Guidance	Suggest you add Regulatory Guide 8.35, Revision 1, "Planned Special Exposure."
2.	Page 3 – Background, third paragraph	Suggest you discuss that emergency dose, including that from other countries from emergency response and recovery operations, should be included in the determination of the annual occupational dose.
3.	Page 4 – Planned Special Exposures	With this draft regulatory guide, there are now 2 regulatory guides that provide information on occupational doses from planned special exposures. To avoid the use of multiple regulatory guides for the same issue and to minimize licensee confusion, suggest that all information pertaining to occupational doses from planned special exposures be eliminated from this document and included in Regulatory Guide 8.35 only. This document, however, should reference Regulatory Guide 8.35 and point the reader to it.
4.	Page 7 – Monitoring Criteria, second "a)"	Suggest you keep the words "for ingestion and inhalation" from the previous revision. These words add clarity to the requirement.
5.	Page 20 - References	Suggest you add Regulatory Guide 8.35, Revision 1, "Planned Special Exposure."