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November 20, 2014
RC-14-0186

Ms. Annette L. Vietti-Cook
Secretary
U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001

ATTENTION: Rulemakings and Adjudications Staff

Dear Ms. Vietti-Cook

Subject: VIRGIL C. SUMMER NUCLEAR STATION (VCSNS) UNIT 1
DOCKET NO. 50-395
OPERATING LICENSE NO. NPF-12
COMMENTS ON THE NRC ADVANCE NOTICE FOR PROPOSED
RULEMAKING FOR 10 CFR PART 20, "RADIATION PROTECTION"
(*FEDERAL REGISTER* VOL. 79, 143), DATED JULY 25, 2014 – DOCKET ID
NRC-2009-0279

On July 25, 2014 an Advanced Notice for Proposed Rulemaking (ANPR) was published in Federal Register Notice (79 Fed. Reg. 143) docketed (Docket ID NRC-2009-0279) to revise the Nuclear Regulatory Commission's regulations in 10 CFR Part 20, "Radiation Protection," and requested comments by November 24, 2014.

South Carolina Electric & Gas Company (SCE&G) endorses the Nuclear Energy Institute's (NEI) November 24, 2014 letter written on behalf of the nuclear energy industry and recommends that the NRC not make the changes proposed in the ANPR because they are unnecessary with no cost-benefit and provide little to no improvement in the health and safety of workers, public or the environment.

SCE&G concurs with the NRC Commission's position as stated in the NRC SRM-SECY-08-0197 that current standards continue to provide adequate protection of the health and safety of workers, the public and the environment.

SCE&G also concurs with the NRC Commission that the recommendations contained in ICRP Publication 103 (2007) proposes measures that go beyond what is needed to provide adequate protection.

SCE&G believes that the nuclear industry's current operating practices protect workers, the public and the environment far beyond regulatory requirements for the nuclear energy industry by:

- Effectively demonstrating the ALARA principle with respect to worker exposure;
- Maintaining plant system operating limits to a fraction of the federal limits; and
- Operating our facilities such that doses to members of the public from plant effluents to less than 0.1% of what the average person receives each year from all sources of radiation.

Furthermore, SCE&G believes that the cumulative effect of regulation resulting from the changes described in the ANPR for 10 CFR Part 20 will place substantial resource burdens on nuclear energy licensees with little or no additional protection of occupational workers or the public. This burden will be further compounded should the potential changes proposed by the U.S. Environmental Protection Agency in the February 2, 2014 ANPR for 40 CFR Part 190 and the changes proposed in the anticipated publication of the ANPR for Part 50, Appendix I be imposed on licensees.

In summary, SCE&G recommends that no changes be made to the existing regulations because (1) existing standards remain protective of occupational workers, public health as well as the environment; (2) the recommendations contained in ICRP Publication 103 propose measures that go beyond what is needed to provide adequate protection; (3) the nuclear industry's current operating procedures and practices protect occupational workers, the public and the environment far beyond the regulatory requirements for the uranium fuel cycle; (4) changing regulations would place significant human and monetary resource burdens on licensees and; (5) there will be a significant cumulative effect of regulation, together with proposed changes to U.S. EPA's 40 CFR Part 190 and NRC's 10 CFR Part 50 Appendix I, on the industry with little or no benefit to worker and public health safety, and the environment.

If there are any questions, or if additional information is required, please contact Mr. Bruce Thompson at (803) 931-5042.

Very truly yours,



Thomas D. Gatlin

SBR/TDG/bd

c: The Honorable Allison M. Macfarlane, Chairman, NRC
The Honorable Kristine L. Svinicki, Commissioner, NRC
The Honorable William C. Ostendorff, Commissioner, NRC
The Honorable Jeff Baran, Commissioner, NRC
The Honorable Stephen G. Burns, Commissioner, NRC
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