

March 24, 2015

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

**Attn:** Rulemaking and Adjudications Staff

**Subject:** 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)

Dear Ms. Vietti-Cook:

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.

On November 20, 2014 a Federal Register Notice (*79 Fed. Reg. 69065*) extended the comments due date to March 24, 2015.

Southern California Edison endorses the Nuclear Energy Institute's (NEI) March 24, 2015 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, providing little to no improvement in the health and safety of workers, public or the environment. Southern California Edison 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.

Southern California Edison 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.

Southern California Edison 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:

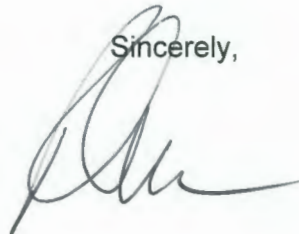
- Effectively demonstrating the ALARA principle with respect to worker exposure;
- Maintaining plant system operating limits to a fraction of the federal limits; and
- Operating our facilities such that doses to members of the public from plant effluents are less than 0.1% of what the average person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

Furthermore, Southern California Edison believes that the cumulative effect of regulation (CER) 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 addition, for permanently retired units such as San Onofre, the proposed changes would impose significant costs for training, software upgrades, equipment purchases, and procedure revisions. Those costs would not be offset by benefits to workers or the public because the major demolition that incurs significant radiological work will likely be completed in a few years. The utility staff will be very small and accrue minimal dose in an oversight capacity. The majority of the demolition workforce will not accrue significant exposure. Therefore there is little likelihood of anyone approaching any regulatory limits, neither current nor proposed.

In summary, Southern California Edison 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 Ms. Andrea Sterdis at (949) 368-9985.

Sincerely,

A handwritten signature in black ink, appearing to be the name of the signatory, written in a cursive style.

cc: The Honorable Stephen G. Burns, Chairman, NRC  
The Honorable Kristine L. Svinicki, Commissioner, NRC  
The Honorable William C. Ostendorff, Commissioner, NRC  
The Honorable Jeff Baran, Commissioner, NRC

Mr. Mark A. Satorius, Executive Director for Operations, NRC

Ms. Laura Dudes, Director, MSST, NRC

Dr. Donald Cool, Senior Advisor, NMSS, NRC

Mr. Mark L. Dapas, Regional Administrator, NRC region IV

Mr. Thomas J. Wengert, NRC Project Manager San Onofre Units 2 and 3

Ms. Marlayna G Vaaler, NRC Project Manager, SONGS Unit1

Mr. William C. Allen, NRC Project Manager, SONGD ISFSI