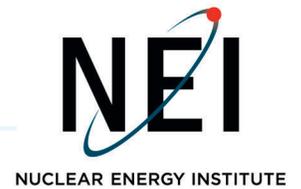


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October 6, 2015

Ms. Rebecca Tadesse  
Chief, Radiation Protection Branch  
Office of Nuclear Regulatory Research  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

Dear Ms. Tadesse,

Since October 2015, the nuclear power industry has been working closely with dosimetry software vendors, IT experts and the computer programmers from PADS<sup>1</sup> to revise NRC Forms 4 & 5 for implementation of the new forms by 1/1/2016. It has been a very arduous and costly process because of the numerous computer interfaces that must be coordinated for this to be accomplished. It was brought to NEI's attention late last week that due to the complexity of the PADS software system and the changes in the formatting of Forms 4 & 5, that there is a problem with obtaining historical EDEX data (prior to 2016) due to an incompatibility in the transfer of data from PADS using the old format into the revised format.

Understanding that this issue must be resolved in a timely manner in order for industry to meet the 1/1/2016 implementation date, NEI initiated an industry-wide conference call with dosimetry software vendors and PADS programmers on Monday, October 5, 2015 to make industry aware of the problem and to seek expertise to resolve this issue.

Industry and computer software experts have determined a solution to this problem; however, prior to executing this solution, on behalf of industry, NEI is requesting NRC's concurrence as follows:

Allow the use of the quantity TEDE (Box 17) only for records received from PADS for other facility dose, when EDEX monitoring occurred prior to 2016. This is due to computer software difficulties associated with determining the EDEX (11a) and DDE (11b) quantities using historical EDEX-related dose records contained in PADS. This issue exists because there was no required, specified format of the input data when the use of EDEX was promulgated. This practice continues today.

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<sup>1</sup> PADS or Personnel Access Data System has been used by the nuclear power industry to collect and track supplemental worker exposure data since the early 1990's.

To better understand this issue, please note the following two examples of the same exposure record, where both are currently acceptable using guidance contained in Regulatory Guide 8.7 Revision 2:

DDE	LDE	SDEWB	SDEME	CEDE	CDE	TEDE	TODE	Comments
357	355	361	364	NR	NR	357	361	Of the 0.357 rem reported DDE, 0.012 Rem is Effective Dose Equivalent. The maximum DDE of 0.361 Rem is reported in TODE.

DDE	LDE	SDEWB	SDEME	CEDE	CDE	TEDE	TODE	Comments
357	355	361	364	NC	NC	357	NC	0.012 Rem is Effective Dose Equivalent. 0.361 Rem reported in TODE is the maximum DDE.

These records would be difficult, if not impossible, for software interface interpretation to determine what quantities to place into box 11b and in the case of the second example, boxes 11b and 18. **There is no reliable way to parse the words in the comments section as there is no required, consistent format.** However, in both cases, the TEDE value of 357 is clear and unambiguous and could easily be transferred from the current format to the revised Forms 4 & 5.

Furthermore, current draft revision 3 to Regulatory Guide 8.7 is silent on how to treat historical data except the statement in section 1.3: "*Licensees are not required to revise, retrospectively, historical dose records to reflect the content or format of the currently approved versions of the forms...*" However, this problematic issue involves the transfer of data from the old format into the revised format. We believe that this request would simply be an expansion of the existing statement in section 1.3.

Again, because the 1/1/2016 implementation date is fast approaching with still much work to accomplish, we request an expeditious response to this request. We would be happy to engage with you and your staff about this issue at your earliest convenience should you so desire.

Sincerely,



Ellen P. Anderson

c: Undine Shoop, NRR, NRC