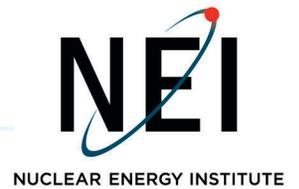


ELLEN P. ANDERSON

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October 22, 2015

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

Subject: Request for Extension

Project Number: 689

Dear Ms. Tadesse:

Since October 2014¹, the nuclear power industry has been working closely with dosimetry software vendors, IT experts and the computer programmers from PADS² to revise NRC Forms 4 & 5 for implementation of the new forms by 1/1/2016 – the date cited in the *Federal Register*, Vol. 80, 52345, dated August 28, 2015. To date, industry has invested thousands of hours and several millions of dollars to revise existing computer software to conform to the forms' new formats. While it appears to be a simple task to add a new block for capturing EDEX data, industry has experienced several unanticipated problems in the implementation of the revised software. This includes:

1. Problems in the transfer of data between the various dosimetry, access control and supplemental worker dose tracking software programs (i.e. PADS), including the analysis and parceling of PADS EDEX data contained in the "comments" section within PADS to the proper EDEX data block (11a) within Forms 4 & 5 (as previously discussed in my October 6, 2015 letter to you)³; and
2. Upon receipt of revised software from vendors, the requirement for lengthy and complex validation and verification processes to ensure proper communications between dosimetry and access control systems;

¹ This is a correction from my October 6, 2015 letter to you where I erroneously cited October 2015 rather than October 2014 in the opening paragraph.

² 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.

³ NRC instructed licensees to place EDEX data per RIS 2003-04 and Regulatory Guide 8.7 Rev. 2 (2005) in the comments section of Form 5.

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3. Regulatory Guides 8.7, "Instructions For Recording And Reporting Occupational Radiation Dose Data" and 8.34, "Monitoring Criteria And Methods To Calculate Occupational Radiation Doses", that provide guidance to licensees on the monitoring, recording and reporting of dose, are currently being revised. It is an unreasonable burden to licensees to implement the new Forms 4 and 5 without a finalized revision 3 to Regulatory Guide 8.7. Furthermore, a revision to Regulatory Guide 8.7 without an associated revision to 8.34 also places an unreasonable burden because of the inconsistencies that would exist between a 1990's revision of Regulatory Guide 8.34 and a 2015/2016 revision of Regulatory Guide 8.7.

For these reasons, several NRC licensees will not be able to comply with the 1/1/2016 implementation date. We request that NRC extend the implementation date for the revised Forms 4 & 5 until the beginning of the next calendar year upon resolution of these technical and regulatory guidance issues.

Thank you for your consideration of this request. We would be happy to discuss this with you should you desire to do so.

Sincerely,

A handwritten signature in cursive script that reads "Ellen P. Anderson".

Ellen P. Anderson