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SUBJECT: Forwards util comments on draft RG DG-8009, "Interpretation of Bioassay Measurements."

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Gregory M. Rueger
Senior Vice President and
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April 3, 1992

PG&E Letter No. DCL-92-078



U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

Re: Docket No. 50-275, OL-DPR-80
Docket No. 50-323, OL-DPR-82
Diablo Canyon Units 1 and 2
Comments on Draft Regulatory Guide DG-8009

Gentlemen:

Enclosed are PG&E's comments on draft Regulatory Guide DG-8009,
"Interpretation of Bioassay Measurements."

Sincerely,

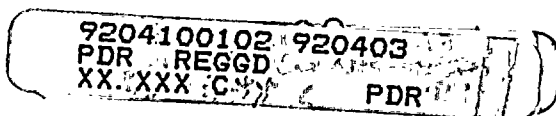
A handwritten signature in dark ink, appearing to read 'Greg Rueger'. The signature is fluid and cursive, with a long horizontal stroke at the end.

Gregory M. Rueger

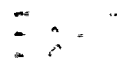
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Enclosure

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ADD 1



ENCLOSURE

COMMENTS ON DRAFT REGULATORY GUIDE DG-8009,
"INTERPRETATION OF BIOASSAY MEASUREMENTS"Comment 1

Draft Regulatory Guide DG-8009 endorses the methodology in NUREG/CR-4884, "Interpretation of Bioassay Measurements." It does not discuss other acceptable means of assessing internal uptakes, such as ANSI N343 endorsed by Regulatory Guide 8.26, ICRP-30, or computer models employing these methodologies. These are all acceptable methodologies and they should be included in the regulatory guide.

Comment 2

The regulatory guide does not discuss the use of any "investigation levels." The regulatory guide should provide guidance on levels below which further followup and dose assessment is not required.

Comment 3

It is not always practical to take multiple measurements for bioassay. If an intake is conservatively estimated, it should be acceptable to use only one measurement. Although this is inferred in Appendix A examples, the regulatory guide should specifically discuss single bioassay measurements in the body of the regulatory guide when multiple measurements are not practical.

Comment 4

The regulatory guide should have provision to permit the licensee to determine doses directly from derived air concentration (DAC)-hours, as well as annual limit on intake values, since the DAC-hour is directly convertible to dose equivalent. This will permit the licensee to maintain only one set of units for internal dose tracking.

Comment 5

The Table of Input Values on page A-14 is inconsistent with the weighting factor table in the definitions section of 10 CFR 20 and the table contained in the instructions for completing Forms 4 and 5 in draft Regulatory Guide DG-8007, "Instructions for Recording and Reporting Occupational Radiation Exposure Data." Each table contains different weighting factor information. The weighting factors in the Regulatory Guides should be consistent with each other and with 10 CFR 20.

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