

RulemakingComments Resource

From: ASHKEBOUSSI, Nima <nxa@nei.org>
Sent: Wednesday, January 18, 2017 3:33 PM
To: RulemakingComments Resource
Subject: [External_Sender] Comments on Individual Monitoring Devices Petition for Rulemaking (Docket No. PRM-34-7; NRC-2016-0182)
Attachments: 01-18-17_NRC_Individual Monitoring Devices PRM.pdf

January 18, 2017

Ms. Annette Vietti-Cook
Secretary
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
ATTN: Rulemakings and Adjudications Staff

Subject: Comments on Individual Monitoring Devices Petition for Rulemaking (Docket No. PRM-34-7; NRC-2016-0182)

Project Number: 689

Dear Ms. Vietti-Cook:

On behalf of the Nuclear Energy Institute's^[1] members, we appreciate the opportunity to comment on the petition for rulemaking (PRM) requesting that the Nuclear Regulatory Commission (NRC) amend its regulations to authorize the use of modern individual monitoring devices for industrial radiography personnel (Docket No. PRM-34-7; NRC-2016-0182). Specifically, the petitioner seeks authorization to use enhanced electronic personnel monitoring dosimeters and dual-function alarming rate meters and electronic dosimeters. While the PRM focuses on 10 CFR Part 34, emerging monitoring technologies can be adopted by other licensees that would also benefit from revised rule language and related guidance. Therefore, in principle, we support the PRM and recommend that NRC revise the prescriptive language in Part 20 and related guidance documents, such as the NUREG-1556 Series and Regulatory Guide 8.34, to allow a more performance based approach that recognizes the use of emerging personnel monitoring technology to demonstrate regulatory compliance.

Thank you for your consideration of these comments. Please contact me if you have any questions.

Sincerely,

Nima Ashkeboussi
Sr. Project Manager, Radiation and Materials Safety

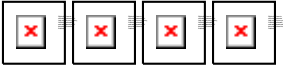
Nuclear Energy Institute
1201 F St., NW, Suite 1100
Washington, DC 20004
www.nei.org

P: 202-739-8022
M: 202-375-0490
E: nxa@nei.org



TAKE THE NEI FUTURE OF ENERGY QUIZ, www.NEI.org/whynuclear

FOLLOW US ON



This electronic message transmission contains information from the Nuclear Energy Institute, Inc. The information is intended solely for the use of the addressee and its use by any other person is not authorized. If you are not the intended recipient, you have received this communication in error, and any review, use, disclosure, copying or distribution of the contents of this communication is strictly prohibited. If you have received this electronic transmission in error, please notify the sender immediately by telephone or by electronic mail and permanently delete the original message. IRS Circular 230 disclosure: To ensure compliance with requirements imposed by the IRS and other taxing authorities, we inform you that any tax advice contained in this communication (including any attachments) is not intended or written to be used, and cannot be used, for the purpose of (i) avoiding penalties that may be imposed on any taxpayer or (ii) promoting, marketing or recommending to another party any transaction or matter addressed herein.

Sent through www.intermedia.com

^[1] The Nuclear Energy Institute (NEI) is the organization responsible for establishing unified industry policy on matters affecting the nuclear energy industry, including the regulatory aspects of generic operational and technical issues. NEI's members include all entities licensed to operate commercial nuclear power plants in the United States, nuclear plant designers, major architect/engineering firms, fuel cycle facilities, nuclear materials licensees, and other organizations and entities involved in the nuclear energy industry.

NIMA ASHKEBOUSSI

*Sr. Project Manager, Radiation and
Materials Safety*

1201 F Street, NW, Suite 1100
Washington, DC 20004
P: 202.739.8022
nxa@nei.org
nei.org



January 18, 2017

Ms. Annette Vietti-Cook
Secretary
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
ATTN: Rulemakings and Adjudications Staff

Subject: Comments on Individual Monitoring Devices Petition for Rulemaking (Docket No. PRM-34-7; NRC-2016-0182)

Project Number: 689

Dear Ms. Vietti-Cook:

On behalf of the Nuclear Energy Institute's¹ members, we appreciate the opportunity to comment on the petition for rulemaking (PRM) requesting that the Nuclear Regulatory Commission (NRC) amend its regulations to authorize the use of modern individual monitoring devices for industrial radiography personnel (Docket No. PRM-34-7; NRC-2016-0182). Specifically, the petitioner seeks authorization to use enhanced electronic personnel monitoring dosimeters and dual-function alarming rate meters and electronic dosimeters. While the PRM focuses on 10 CFR Part 34, emerging monitoring technologies can be adopted by other licensees that would also benefit from revised rule language and related guidance. Therefore, in principle, we support the PRM and recommend that NRC revise the prescriptive language in Part 20 and related guidance documents, such as the NUREG-1556 Series and Regulatory Guide 8.34, to allow a more performance based approach that recognizes the use of emerging personnel monitoring technology to demonstrate regulatory compliance.

Thank you for your consideration of these comments. Please contact me if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Nima Ashkeboussi". The signature is written in a cursive, flowing style.

Nima Ashkeboussi

¹ The Nuclear Energy Institute (NEI) is the organization responsible for establishing unified industry policy on matters affecting the nuclear energy industry, including the regulatory aspects of generic operational and technical issues. NEI's members include all entities licensed to operate commercial nuclear power plants in the United States, nuclear plant designers, major architect/engineering firms, fuel cycle facilities, nuclear materials licensees, and other organizations and entities involved in the nuclear energy industry.