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 STN-50-529 Palo Verde Nuclear Station, Unit 2, Arizona Publi 05000529
 STN-50-530 Palo Verde Nuclear Station, Unit 3, Arizona Publi 05000530

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SUBJECT: Urges that high occupational dose exposures at CESSAR 80 plants be investigated. Application of ALARA principle should result in lower dose estimates. Basis for dose estimates has not been examined in detail.

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The first part of the document discusses the importance of maintaining accurate records of all transactions. It emphasizes that every entry should be supported by a valid receipt or invoice. This ensures transparency and allows for easy verification of the data.

In addition, it is crucial to review the records regularly to identify any discrepancies or errors. This proactive approach helps in resolving issues before they become significant problems. The document also mentions the need for secure storage of these records to prevent loss or unauthorized access.

The second section focuses on the role of technology in modern record-keeping. It highlights how digital tools can streamline the process, reducing the risk of human error and saving time. Cloud-based solutions are particularly beneficial as they allow for real-time access and collaboration across different departments.

However, the document also cautions against over-reliance on technology. It stresses the importance of having a backup plan in case of a system outage or data breach. Regular backups and security protocols are essential to protect the integrity of the records.

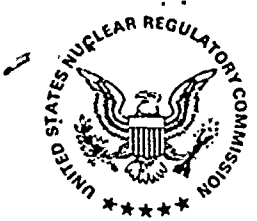
The third part of the document addresses the legal and regulatory requirements for record-keeping. It outlines the specific rules and standards that must be followed to ensure compliance. This includes the retention period for different types of records and the format in which they should be stored.

It also discusses the consequences of non-compliance, which can range from fines to legal action. Therefore, it is imperative for organizations to stay updated on the latest regulations and consult with legal counsel when necessary.

Finally, the document concludes by reiterating the overall goal of effective record-keeping: to provide a clear, accurate, and accessible history of the organization's activities. This not only supports internal operations but also enhances the organization's credibility and trustworthiness in the eyes of its stakeholders.

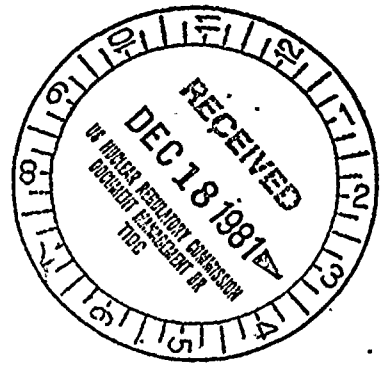
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UNITED STATES
NUCLEAR REGULATORY COMMISSION
ADVISORY COMMITTEE ON REACTOR SAFEGUARDS
WASHINGTON, D. C. 20555

December 16, 1981



MEMORANDUM FOR: Mr. William J. Dircks
Executive Director for Operations

FROM: Mr. Raymond F. Fraley
Executive Director
Advisory Committee on Reactor Safeguards

Subject: OCCUPATIONAL EXPOSURES AT PALO VERDE NUCLEAR GENERATING STATION
AND OTHER SYSTEM 80 PLANTS

During its review of the CESSAR-80/Palo Verde Nuclear Generating Station, Units 1, 2, and 3, the ACRS was provided estimates of the annual collective occupational dose associated with the operation of each unit at the Palo Verde Station which may average well over one-thousand person rem. In view of the fact that these units are based on a standard design which supposedly incorporates application of the ALARA principle, the members expected somewhat lower dose estimates.

In this connection, it should be noted that the occupational dose estimates may have been unduly conservative and therefore misleading. The Committee's review did not provide an opportunity to examine the basis for these dose estimates in detail and this should be done to determine if they result from the CESSAR-80 design, the balance of plant design, the proposed method of operation, or other factors.

The Committee urges attention to this matter regarding the Palo Verde Station and the CESSAR-80 standardized plant design. The ACRS Subcommittee on Reactor Radiological Effects would be pleased to discuss this matter further with the NRC Staff.

Raymond F. Fraley
Raymond F. Fraley
Executive Director
ACRS

- cc: C. Mark, ACRS
- H. Denton, NRR
- E. Goodwin, NRR
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- W. E. Kreger, NRR

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