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October 3, 1979

Secretary of the Commission  
Att: Docketing and Service Section  
US Nuclear Regulatory Commission  
Washington, DC 20555

The following comments concerning proposed Revision 4 to Regulatory Guide 8.8, "Information Relevant to Ensuring that Occupational Radiation Exposures at Nuclear Power Stations Will be as Low as is Reasonably Achievable" (ALARA), are presented for your consideration:

1. Page 5, last paragraph - In addition to those activities listed, close work with Health Physics technicians, pre-planning programs with the Health Physics Department and training sessions with the workmen are effective methods of reducing exposure and warrant mentioning.

In order to maximize the value of debriefings, debriefings should be held as soon as practically possible following completion of a job.

It would be beneficial for this Section and Section c on page 13 to emphasize the importance and value of workmen training for particular jobs.

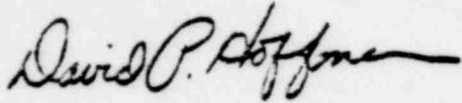
2. Page 20, paragraph d - Plant design features for the control of airborne and gaseous radiation sources should be based on studies of the solutions to operational problems at other power stations.
3. Page 25, paragraph g - CPCo knows of no such central or built-in monitoring system that has been installed in an operating plant. The proposal of such a system gives rise to serious questions concerning the system's reliability and leads one to wonder if system maintenance and repair might not lead to more exposure than the system might prevent.
4. Several portions of this Regulatory Guide present outstanding guidance for occupational exposure reductions. The "Radiation Protection Program" in Section 3 is generally a good program and the idea of a coordination committee as discussed in paragraph 4 on page 11 is an excellent proposal.

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Please consider these comments in future actions concerning this guide..

A handwritten signature in cursive script, reading "David P. Hoffman". The signature is written in dark ink and has a fluid, connected style.

David P Hoffman  
Assistant Nuclear Licensing Administrator

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