SCHOOL OF NUCLEAR ENGINEERING OH 804-4

Atlanta, Georgia 30332

October 4, 1979



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Secretary of the Commission U.S. Nuclear Regulatory Commission Docketing and Service Branch Washington, D.C. 20555

Dear Sir:

Enclosed please find my comments on the draft Regulatory Guide "Audible Alarm Dosimeters." Although my comments are few I do believe that this guide indicates that certain other Standard Technical Specifications, etc. should come under close scrutiny.

Thank you for the opportunity to comment on this Guide.

Sincerely,

John W. Poston Professor of Nuclear Engineering

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Page 3, "Regulatory Position," item 2.

Remove the word "generally" and the footnote. Audible-alarm dosimeters should <u>never</u> be used as the primary warning device. The exception in Standard Technical Specification 6.12.1 is ridiculous! This exception should be reviewed and in my opinion eliminated. The reasons for this are stated clearly in Section B, "Discussion" of this Regulatory Guide.

Value/Impact Statement Section D Procedural Approach, item 2

Third paragraph is not correct. The ANSI standard, in draft, is reproduced almost verbatim in the Appendix. The consensus ballot on this proposed standard closes on October 9, 1979. Therefore, the standard will be available for use before the comment period on this Regulatory Guide closes and could be cited. Secondly, the Regulatory Guide does not provide any guidance on the use of audible-alarm dosimeters either. Therefore, citing the ANSI standard should not be a detriment to the Guide.

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