

CP&L

Carolina Power & Light Company

P. O. Box 1551 • Raleigh, N. C. 27602

NRA PUBLIC DOCUMENT BOARD

DOCKET NUMBER
PROPOSED RULE PR-19,20 (49 FR 10388) ⁸²

J. A. JONES
Executive Vice President
Chief Operating Officer

May 15, 1979

Mr. Samuel J. Chilk
Secretary of the Commission
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

ATTENTION: Docketing and Service Branch

Dear Mr. Chilk:



The Nuclear Regulatory Commission (NRC) is proposing amendments to its regulations that would eliminate the accumulated dose averaging formula, 5(N-18), and the associated Form NRC-4 exposure history, and impose annual dose-limiting standards while retaining quarterly standards. Related amendments would express, in terms of the new annual standards, the standard for dose to minors, the requirements for control of total dose to all workers including transient and moonlighting workers.

The Commission has already determined that a hearing should be held on the adequacy of present occupational radiation dose-limiting standards. This hearing is tentatively scheduled to be held in the spring of 1979. The hearing should address all technical aspects of the current occupational radiation dose limits and any need to revise the limits.

If the current dose averaging formula is eliminated, the Commission must realize the need for some form of dose averaging beyond the proposed five rem per year annual limit. ICRP Publication 26, "Recommendations of the International Commission on Radiological Protection," adopted January 17, 1977, recognized the need to permit a few workers to receive dose equivalents in excess of the applicable limits. The ICRP noted that planned special exposures may be permitted provided the dose-equivalent commitment does not exceed twice the relevant annual limit in a single event and, in a lifetime, five times the limit. The proposed amendments to 10CFR20 should include provisions for planned special radiation exposures.

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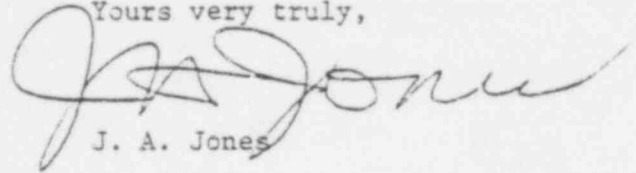
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The use of the planned special exposures would be limited to situations where the radiation levels associated with the activity coupled with the limited technical expertise to perform the activity require the use of these special exposure limits.

Your consideration of our comments will be appreciated.

Yours very truly,

A handwritten signature in cursive script, appearing to read "J. A. Jones".

J. A. Jones

JAJ:fdcT3