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Reg. Guide

May 22, 1979
L-79-132

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:

Re: Regulatory Guide 4.15 "Quality Assurance
for Radiological Monitoring Programs
(Normal Operations) - Effluent Streams
and the Environment"



Florida Power and Light Company has reviewed the referenced document and submits the following comment.

This revision adds additional specific qualification requirements in section C.9 (Audits) which were not in Revision 0. The requirements for the qualifications of auditors are already adequately described in issued or draft Regulatory Guides such as R.G. 1.144 and Task 810-5. These existing requirements apply to personnel auditing activities which are at least as technically complex as radiological monitoring. Accordingly, we recommend that words "qualified in radiochemistry and monitoring techniques" be deleted from this Regulatory Guide.

Thank you for the opportunity to submit this comment.

Sincerely,

Robert E. Uhrig
Vice President
Advanced Systems & Technology

REU:JRP:cf

Acknowledged by card. 6/13/79

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