



DOCKET NUMBER
PROPOSED RULE PR-Misc Justice
Reg. Guide (NRC PUBLIC DOCUMENT ROOM)

Department of Energy
Clinch River Breeder Reactor
Plant Project Office
P.O. Box U
Oak Ridge, Tennessee 37830

File: 05.11

April 23, 1979

Secretary of the Commission
U. S. Nuclear Regulatory Commission
Washington, DC 20555

ATTN: Docketing and Service Branch

Dear Sir:

PROPOSED REVISION 2* TO REGULATORY GUIDE 1.8



The subject Regulatory Guide has been reviewed. Our comments follow:

Item 5, which refers to Section 4.4.4, "Radiation Protection" of ANSI/ANS 3.1-1978, places qualifications on the onsite health physicist which could pose hardships on utilities that currently do not have a certified health physicist located on-site at each nuclear plant. Some utilities provide technical direction and other services to the onsite health physics program conforming to ANSI/ANS 3.1-1978, Section 4.4.4 with certified health physicists located offsite at a central office. If this proposed revision requiring on-site certified health physicists is adopted, the utilities will need a transition period to establish the required training program and to recruit personnel.

It is recommended that consideration of a transition period be incorporated in the implementation section of this guide.

Sincerely,

Raymond L. Copeland
Raymond L. Copeland
Acting Assistant Director
for Public Safety

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Acknowledged by card... 6/13... *de*

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