Alabama Power Company
600 North 18th Street
Post Office Box 2641
Birmingham, Alabama 35291
Telephone 205 323-5341

OH-705-1
Bell

(77)
-19,20(44FR10388)

Alabama Power
the southern electric system

May 1, 1979

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

Attention: Docketing & Service Branch

Gentlemen:

Reference: Proposed Amendments to
10CFR20.

As the licensee for the Joseph M. Farley Nuclear plant we have the following comments regarding the proposed amendments:

1. 10CFR20.101. The elimination of the 5(N-18) accumulative dose rule should not cause an immediate problem with respect to our own employees, since the rule would be used only under exceptional circumstances. However, we are opposed to its elimination on the grounds that the rare occasion may arise where it is needed to accomplish special work. Further, its elimination will have an immediate and direct impact on a small group of contract workers having special skills. Its elimination will not lower the total man-rems required to accomplish special surveillance and maintenance tasks, e.g. eddy current testing of steam generator tubes, and could result in a net increase of total man-rems by the use of additional personnel to do the work.

   Although, not related to dose, the elimination of the 5(N-18) rule would reduce the record keeping load related to securing and maintaining a prior lifetime exposure history on each worker.

2. 10CFR20.104(a). This change would not affect us, since it is Company policy not to employ persons under 18 years of age.

5/22

288 108

7907050263

3. 10CFR20.202. The slight decrease in the level at which personnel monitoring equipment is required is not expected to have a significant impact on our present personnel monitoring program.

Yours very truly,

H. O. Thrash
Manager
Nuclear Generation

HOT/WMJ/mmb