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PROPOSED RULE PR-19, 20(44FR10388)

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April 25, 1979

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

ATTENTION: Docketing and Service Branch

Subject: Comments on Proposed Amendment to 10 CFR 20

Dear Mr. Chilk:

On February 20, 1979, the Nuclear Regulatory Commission published in the Federal Register (44 F.R. 10388 et seq.) proposed amendments to its regulations and requested comments on the proposals. We appreciate this opportunity to provide the Commission with Philadelphia Electric Company's comments on the proposed amendments.

One of the proposals being made by the Commission is to delete the accumulated dose averaging formula, 5(N-18), from the regulations in Part 20. We concur with this proposal and with the related proposal to eliminate the need for signed NRC-4 forms. We also concur with the Commission's proposal to revise Section 20.102. of the regulation to require a worker to sign a statement describing his previous exposure for the year. We believe that this requirement rightfully places some responsibility on the worker himself and will have the added benefit of encouraging the worker to become more aware of his accumulated dose.

The Commission is also proposing to establish annual limits for radiation doses of 5 rem per year, as well as the quarterly limits of 3 rems per calendar quarter. The rationale for imposing the quarterly limit is to enable the Commission to receive early indications of possible undesirable situations and provide the NRC the opportunity to investigate such situations. We believe that it would be more appropriate

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for the regulations to permit a 5 rem exposure at any time during the year even if the exposure occurred in a single calendar quarter, since there is no significant difference in biological effect between an annual limit of 5 rem and a quarterly limit of 3 rem. For purposes of notification and control, the regulations could still require a licensee to notify the Commission in the event of an exposure in excess of 3 rems per quarter.

Additionally, we believe some provisions should be made to permit a licensee, on prior application to the Commission, to utilize 12 rem per year in those circumstances when use of the higher limit would be beneficial, e.g. minimizing total radiation exposure.

Very truly yours,