

NSP**NORTHERN STATES POWER COMPANY**

MINNEAPOLIS, MINNESOTA 55401

DOCKET NUMBER

PROPOSED RULE

①
PR-20

(45FR18023)

April 17, 1980

Secretary of the Commission
 US Nuclear Regulatory Commission
 Washington, DC 20555
 Attn: Docketing and Service Branch

MONTICELLO NUCLEAR GENERATING PLANT
 Docket No. 50-263 License No. DPR-22

PRAIRIE ISLAND NUCLEAR GENERATING PLANT
 Docket Nos. 50-282 License Nos. DPR-42
 50-306 DPR-60



Comments on Proposed Rulemaking
10 CFR 20, Standards for Protection Against Radiation

Advance notice of proposed rulemaking under 10 Part CFR 20, Standards for Protection Against Radiation, was published in the Federal Register dated March 20, 1980. Comments on the proposed rulemaking were solicited. NSP, as an operating reactor licensee, has been subjected to ever-expanding reporting requirements by the NRC, although in a few instances in recent years the NRC has made revisions which eliminated some unneeded reporting and has consolidated a few other reporting requirements. We offer for consideration a consolidation and simplification of occupational exposure reporting requirements.

10 CFR 20.407 requires the submittal, within the first quarter of each calendar year, of a personnel monitoring report to the Director of Management and Program Analysis. Nuclear plant technical specifications usually require the submittal of an annual report on occupational exposure covering the previous calendar year and which is to be submitted prior to March 1 of each year. Guidance for the content of this report is contained in NRC Regulatory Guide 1.16, Revision 4, and it is to be submitted to the NRC IE Regional Office (2 copies) and the Director, IE, (40 copies) in accordance with NRC Regulatory Guide 10.1.

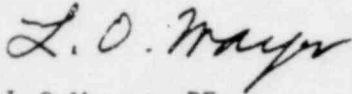
We suggest that the NRC review the needs for the data contained in these two reports with the thought of reducing the amount of data required, and combine the resultant needed data into one annual report with one primary NRC addressee and a substantially reduced number of copies. If the regulation as revised contains a requirement for a report which substitutes for the report currently required by

ack by card
 TC
 5/1/80

NORTHERN STATES POWER COMPANY

Secretary of the Commission
April 17, 1980
Page -2-

technical specifications, the NRC can issue amendments removing this requirement from the technical specifications. This would be similar to the removal of the respiratory protection requirements from technical specifications after they had been included in the 10 CFR Part 20 regulations.



L O Mayer, PE
Manager of Nuclear Support Services

LOM/jh

cc G Charnoff
Monticello Nuclear Plant
Prairie Island Nuclear Plant