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F. L. CLAYTON, JR.
Senior Vice President



April 25, 1980

Docket No. 50-348

Director
Office of Nuclear Reactor Regulations
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555
Attn: Mr. A. Schwencer

Dear Sir:

Alabama Power Company requests certain clarifications and/or authorizations with regards to the record keeping requirements of 10CFR20 as presented below.

10CFR20 - Section 20.401 states in part:

- (a) Each licensee shall maintain records showing the radiation exposures of all individuals for whom personnel monitoring is required under 20.202 of the regulations of this part. Such records shall be kept on Form NRC-5...
- (c)(1) Records of individual exposure...shall be preserved until the Commission authorizes disposition.

10CFR20 - Section 20.102 states in part:

- (b)(2) Calculate on Form NRC-4...the previously accumulated occupational dose...
- (c)(1) In the preparation of Form NRC-4...the licensee shall make a reasonable effort to obtain reports of the individual's previously accumulated occupational dose...
- (c)(2) The licensee shall retain and preserve records used in preparing Form NRC-4 until the Commission authorizes their disposition.

Alabama Power Company fully supports the intent of 10CFR20 in general and the record retention requirements of §20.401 specifically. Form NRC-5 is utilized in accordance with §20.401 at the Joseph M. Farley Nuclear Plant and these forms are designated lifetime records.

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In addition Form NRC-4, certified by the individual in accordance with §20.102(b)(1), is completed and retained as a permanent record.

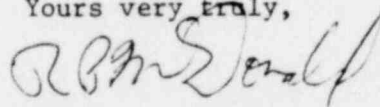
Since Form NRC-4 is prepared from exposure records obtained from previous employers and since those employers, like Alabama Power Company, are required to maintain permanent records of employee exposure received at their facility and to provide records of such exposure to the employee and the NRC upon termination, such records are available from several sources. Therefore, the requirement of 10CFR20 Section 102(c)(2) is superfluous and burdens our file system.

Therefore, Alabama Power Company requests the following:

1. An interpretation regarding whether or not the records of other employers utilized in preparing Form NRC-4 are required to be retained by Alabama Power Company "until the commission authorizes their disposition".
2. If the interpretation of 1. above is affirmative, please provide authorization to dispose of such records upon completion and certification of Form NRC-4 for each employee.

This requirement is a very significant administrative burden to this Company. Your cooperation is appreciated.

Yours very truly,



for F. L. Clayton, Jr.

FLCJr/JRC:bj

cc: Mr. R. A. Thomas
Mr. G. F. Trowbridge