

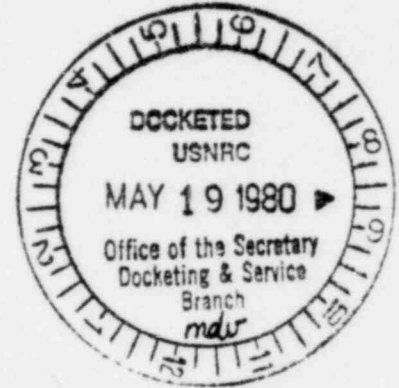


Commonwealth Edison
 One First National Plaza, Chicago, Illinois
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OH 940-4

May 15, 1980

DOCKET NUMBER
 PROPOSED RULE PR-Misc. Notice
Reg. Guide



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

Attention: Docketing and Service Branch

Subject: Proposed Revision 2 to Regulatory Guide 8.14
 "Personnel Neutron Dosimeters" Task OH 940-4

Dear Sir:

Commonwealth Edison has reviewed the subject
 Regulatory Guide and provides the attached comments. We
 appreciate having been given the opportunity to comment.

Sincerely,

D. L. Peoples
 Director of
 Nuclear Licensing

attachment

Acknowledged by card. 5/22/80 mdu...

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Commonwealth Edison

Comments

Proposed Revision 2 to Regulatory Guide 8.14 "Personnel Neutron Dosimeters" Task OH 940-4

The tone of the proposed revision suggests that albedo neutron dosimeters are an acceptable neutron dosimeter for power applications. Such statements as (1) "albedo neutron dosimeters are generally believed to be more sensitive than required by the standard for most neutron exposure circumstances, (2) albedo neutron systems usually require close body contact at all times during usage, (3) sizable errors can occur if close body contact is not maintained, and (4) albedo neutron dosimeters should have a means of maintaining this necessary close contact with the body" do not support this suggestion.

The proposed revision to the guide points out the limitations of NTA film which is well known in the industry as evidenced by the fact that only one out of fifteen PWR's surveyed by the NRC used NTA film to assess neutron dose. However, the guide fails to support the case for albedo dosimetry. For example, questions as to the commercial availability of albedos, power reactor operational experience with these dosimeters, and the suitability of the dosimeter to the full spectrum of neutron energies encountered at power reactors remain unanswered.

Until these questions are answered satisfactorily it is recommended that all references to this type of dosimetry system be deleted from the guide.