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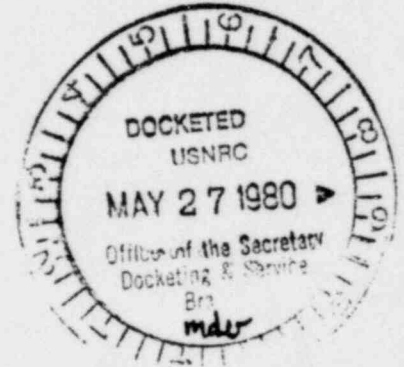
General Offices: 212 West Michigan Avenue, Jackson, Michigan 49201 • (517) 788-0550

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PROPOSED RULE

PR-Misc. Notice
Reg Guide



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

The following comments concerning proposed Revision 2 to Regulatory Guide 8.14, "Personnel Neutron Dosimeters", are presented for your consideration:

1. It is possible that from reading the Regulatory Position contained in this guide, one might conclude that neutron dosimetry is preferable to calculated dose equivalents in all cases, and that dosimetry is required when doses in excess of 100 mrem/quarter are expected. Consumers Power Company believes that this is not the intent of the guide. Therefore, Consumers Power Company requests that words be added to paragraphs C.1.b. and c. which indicate clearly that neutron dosimetry is not necessarily required when expected doses exceed 100 mrem/quarter, and that in frequent cases, calculated dose equivalents based on survey instrument readings and occupancy times are superior to dosimetry methods.
2. Paragraph C.1.e implies that dosimeters should have the sensitivity necessary for measuring a dose on the order of 10 mrem/quarter. Consumers Power Company believes that such a requirement is unrealistically restrictive. Therefore, Consumers Power Company requests that paragraph C.1.e be altered to state specifically that an acceptable method for the measurement of doses in the 10 to 30 mrem/quarter range is one employing occupancy times and measured values of dose rate.

Even though these comments are being presented beyond the due date, please consider them in future revisions of this guide.

David P. Hoffman

David P Hoffman
Nuclear Licensing Administrator

DPH 62-80

BCC: RWSinderman DMBudzik
ADKowalczyk WRStrodl
CEAxtell

Acknowledged by card. 5/27/80 mdy

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