

NORTHEAST UTILITIES



THE CONNECTICUT LIGHT AND POWER COMPANY
THE HARTFORD ELECTRIC LIGHT COMPANY
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June 26, 1980
B10024

~~DOCKET NUMBER~~

~~REGULATORY RULE~~ ~~PRM~~

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

Attention: Docketing and Service Branch

Dear Sir:

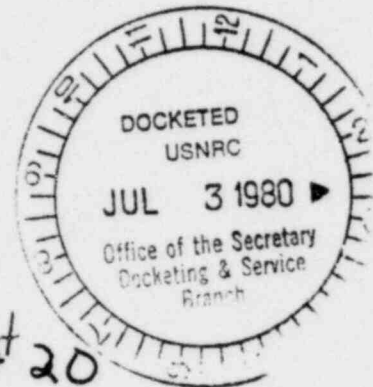
Subject: Comments on Federal Register Notice of March 20, 1980 10 CFR, Part 20, Standards for Protection Against Radiation: Advance Notice of Proposed Rulemaking

Northeast Utilities (NU) is please to be given the opportunity to offer comments on the NRC's proposal to make a major revision to 10 CFR 20. NU has been involved in the management and operation of nuclear power plants since 1968 and presently operates three units at two separate sites.

NU supports the Commissions purpose to bring the regulations into accord with more recent developments in radiation protection to make them more understandable; easily amendable to change; and more practical. However, a few general and specific comments and concerns need to be expressed about such a revision.

A. General Comments

- (1) The existing regulations (10 CFR 20) have been used successfully in the regulatory process for a number of years. It has adequately protected the health and safety of workers and the general public. The public and the worker confidence in the current standards and the regulatory process should not be eroded by a revision that is not carefully considered. Thus, the scientific and technical bases for the revision should be adequately stated and impact-value assessments should be presented. The recommendations of only leading national and international radiation protection bodies such as the NCRP, ICRP and BEIR committees should be followed.
- (2) The NRC should not issue revisions to 10 CFR 20 until the EPA and the newly established Federal Radiation Policy Council's guidance are issued. This will ensure a more cohesive and consistent set of regulations governing radiation protection and help maintain the worker's and the public's confidence in this important area.



DOCKET NUMBER

PROPOSED RULE

PR Part 20

(45 FR 18023)

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L-4-1, PA. 20

- (3) The NRC should not include in the revised regulations details or implementation guidance that are beyond the normal scope of regulatory standards but are more appropriately contained in regulatory guides and NUREG reports. Thus, advances in technology and flexibility of implementation can be adequately accommodated without requiring changes in the regulation.
- (4) The NRC should not require the issuance of reports by the licensee that are of marginal value, e.g., Regulatory Guide 1.16 reports.
- (5) The NRC should not require the evaluation and reporting of exposures below a "regulatory de minimus level", i.e., a level below which there is no practical health significance and which is a small fraction of the regulatory standards. In the case of the general public doses that are fractions of a millirem should not be translated into collective dose (person-rem) for health effects evaluations. In the case of the worker, internal exposures evaluations below the ICRP's Investigation Levels should not be required.

B. SPECIFIC COMMENTS ON "AREAS IN PART 20 THAT NEED IMPROVEMENTS"

(1) Comments on (a) Radiological Protection Principles

- (a) Quantification of occupational ALARA guidelines with collective dose (person-rem) limits are premature and not achievable today. Any attempt to do this is contrary to NU's and the industry's experience gained over the past few years with active ALARA programs. The variability with maintenance activities, age of plant, fuel performance and corrosion product buildup prevent a generalized approach to a quantification of ALARA. Only a detailed job specific ALARA approach such as that described in the draft revision of Regulatory Guide 8.8 is reasonable. NU recommends this latter course of action coupled with a cost-benefit evaluation.

(2) Comments on (b) Standards for Individual Occupational Exposures

- (a) The use of the total dose concept of ICRP 26 is recommended, as it includes a weighted sum of internal and external dose. The recommended limit of ICRP-26 should thus also be considered to be consistent and to maintain the technical bases. However, the evaluation of internal dose below a small fraction of the regulatory standards would be unnecessary, burdensome and its absence will not detract from worker health and safety. The utilization of the ICRP's Investigation Levels for this purpose would be a valid approach.

(b) The provisions to limit collective dose should be carefully reconsidered. The utilization of a "practical threshold" in evaluating the collective dose, i.e., evaluation of collective dose to large numbers of people with a few millirem each or a fraction of a millirem for the average dose to an individual were never intended in the collective dose concept. All of the admonitions and precautions of the NCRP, ICRP and BEIR Committees, if heeded will result in an avoidance of this approach for a regulatory standard.

(3) Comments on (c) Standards for Exposure of the General Public

Siting considerations such as population and dose criteria should be excluded from Part 20. They can be more appropriately treated in Part 10.

(4) Comments on (f) Miscellaneous

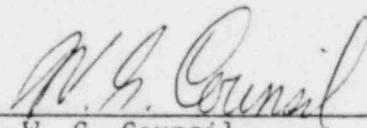
(a) Performance standards (accuracy and reliability) for health physics measurements should be excluded. They can be more appropriately treated and revised as necessary in Regulatory Guides.

(b) The change over to SI units instead of curies, millirem, etc., would greatly confuse the workers and the general public at a time when they are just beginning to more adequately comprehend these units.

NU will be willing to discuss, in detail, these comments if it is necessary. We regret the small delay in submitting these comments and hope the NRC finds them useful.

Yours sincerely,

CONNECTICUT YANKEE ATOMIC POWER COMPANY
NORTHEAST NUCLEAR ENERGY COMPANY



W. G. Council
Senior Vice President