OH 902-4

PP&L

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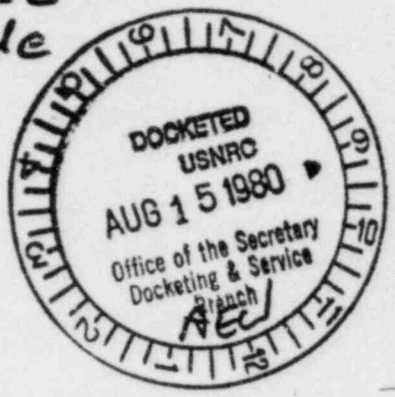

AUG 12 1980

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

Attn: Docketing and Service Branch

SUSQUEHANNA STEAM ELECTRIC STATION
COMMENTS ON REGULATORY GUIDE OH 902-4
ER 100450 FILE 841-9
PLE 216

Dear Sir:

Pennsylvania Power and Light Company has the following comments on Draft Regulatory Guide OH 902-4, "Instruction Concerning Risk from Occupational Radiation Exposure":

- o Pg. 5 Item 2 — Cataracts have not been demonstrated as a stochastic effect resulting from exposure to low LET radiations (See ICRP 26).
- o Pg. 6 Item 4 — The sequence of the first two statements would lead the reader to conclude that there have been accidents in the nuclear industry which resulted in overexposures of the magnitude to cause early health effects. This is simply not the case in the Commercial Nuclear Power Industry.
- o Pg. 7 Item 6 — It is the cancer activation that is not well understood. The basic mechanisms that could potentially lead to a cancer are well understood.
- o Pg. 7 Item 7 — The analogy between cigarette smoking and radiation exposure is inappropriate because the cigarette smoking risk is significantly greater than the radiation exposure risk.

Acknowledged by card. 8-15-80 AEW

PENNSYLVANIA POWER & LIGHT COMPANY

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I+P-11 REG GUIDE

- Pg. 8 Item 7 — Skin cancer due to radiation exposure (i.e. non UV) is a nonstochastic effect. Consequently, one must exceed a threshold level to produce the risk of induction (See ICRP 26).

- Pg. 15 Item 13 — The statement "every activity ... ... should be planned" is inappropriate. It would be impossible to generate power from a Nuclear Facility based upon this premise. The lower dose activities have been designed in such a manner to avoid planning efforts during operation. This whole section needs re-work in that designation of a cost-benefit analysis for every single endeavor would be counter-productive.

- Pg. 25 Item 30 — The statement of reliability is not an accurate reflection of the TLD or Pocket Dosimeter's intended purpose. Both are reliable if utilized properly. It is the cumulative nature of the TLD as opposed to the time and dose dependent measurements of the Pocket Dosimeter that cause the TLD to provide a more accurate accounting of an individual's total exposure.

Very truly yours,

N. W. Curtis
Vice President, Engineering and
Construction - Nuclear