

55 926-9

PICKARD, LOWE AND GARRICK, INC.
1200 18TH STREET, N. W., SUITE 612
WASHINGTON, D. C. 20036

REGISTRATION
DATE

JAMES K. PICKARD
WILLIAM W. LOWE
& JOHN GARRICK

THOMAS R. ROBBINS
JOHN M. VALLANCE
KEITH WOODARD
THOMAS E. POTTER
MARK ABRAMS
MICHAEL H. SCHWARTZ
CARROLL L. CATE
DOUGLAS C. IDEN
RICHARD V. CALABRESE
DENNIS C. BLEY
DANIEL W. STILLWELL, JR.

DAVID M. WHEELER
FRANK R. HUBBARD, III
JOHN W. STETKAR
SIXTO T. ALMODOVAR
LAWRENCE E. HIRNICK

ASSOCIATES
STAN RAPLAN
HAROLD F. PERLA

DOCKET NUMBER
PROPOSED RULE

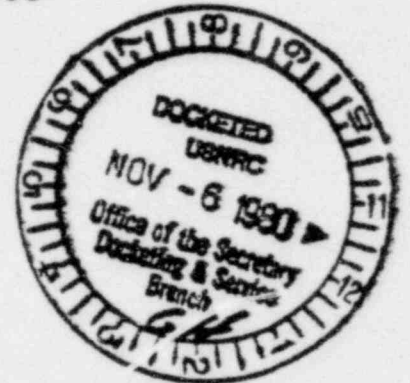
PR *misc notice*
Reg Guide

1980 NOV 17 PM 12 21

WASHINGTON, D. C.
TELEPHONE 202 296-8633

IRVINE, CALIFORNIA
TELEPHONE 714 556-5200

October 30, 1980



Mrs. Leda Brown
Nuclear Regulatory Commission
Washington, DC 20555

Dear Leda:

We have reviewed Revision 1 to Regulatory Guide 1.23 and have the enclosed comments.

We have already tackled the job of programming printouts according to the formats in Table B-1, B-2 and B-3 and have several suggestions that would make the data more useable. We would be glad to discuss our experience at your convenience.

Very truly yours,

Keith Woodard
Keith Woodard

KW/mjv

Enclosures

cc: B. Markee

Acknowledged by card... *11/6/80*

TRP-11

8011210 092

PLG Comments on Regulatory Guide 1.23 (dated September 1980)

1.) Meteorological Parameters (page 5)

The reason for measuring ambient moisture at all plants is not clear. The measuring of dew point is not a very good indicator of fog.

2.) Siting of Meteorological Instruments (page 7)

Locations of instruments at the 10m level may yield data that are not representative of site conditions. The guide should recognize the potential for measurements at other levels being adequate.

3.) Data Recorders (page 8)

The requirement for 180 instantaneous values of σ_g over a 15-minute averaging period is excessive. Tests we have made indicate that 90 samples are adequate. We question the use of hourly σ_g to determine stability according to Slade's scheme. The sigma values in the P-G curves are really 3-minute values.

6.) Data Reduction and Compilation (page 11)

In the event that fogging and/or icing are not problems at a site, the analyses for such effects should not be required.

Appendix A

It is considered an industry standard to indicate calm wind speed with zeros. Putting a field of 7's in for calm wind speed may cause confusion. We prefer use of data codes which preserve the original value of the parameter and give some indication of quality.

Appendix B - Format for Data Interrogation from Meteorological Systems

The operating system should allow for either Julian or calendar date. Most people are not familiar with Julian date. This could lead to mistakes during emergency situations.

We don't understand why the number of hours is required after entering the dates. The number of hours is obvious by inspecting the two dates.

Figure B-2 shows an 80 column print. Most 300 BAUD printers do not print beyond 72 columns.

Spacing of parameters makes print very difficult to read.

Draft Value/Impact Statement

1.3.3 Industry

We question the benefit of knowing exactly where TIBL boundaries are. A conservative dose calculation can be made without assuming TIBL fumigations. At most coastal sites, these TIBL conditions occur during only a few hours each year, making costly studies and additional equipment questionable.