CP&L
Carolina Power & Light Company

June 30, 1981

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Office of Nuclear Reactor Regulation
United States Nuclear Regulatory Commission
Washington, D. C. 20555
Attention: Leader, Radiation Protection Section

COMMENTS ON NUREG-0761

Dear Sir:

Carolina Power & Light Company (CP&L) herewith submits the following comments on NUREG-0761, "Radiation Protection Plan for Nuclear Power Reactor Licensees." It is CP&L's understanding that the NRC plans to use the finalized version of this radiation protection plan as an inspection/enforcement "tool." If the plan were approved by the NRC, the licensee would be expected to demonstrate a health physics program that meets every aspect of this plan. This would include staffing, training, and procedural detail. Therefore, CP&L submits the following three general comments and additional specific comments.

General Comments

1. NUREG-0761 indicates that the licensee should continually upgrade the radiation protection program, incorporating advances in radiation protection which improve the program and provide a standard of excellence above the minimum regulatory requirements. The document should, however, explicitly acknowledge that it is a suggested statement of policy which establishes objectives rather than binding requirements, and that flexibility in the implementation of its specific provisions is contemplated. If the NRC desires to promulgate these objectives as binding requirements, it should do so in a formal manner through the formal mechanisms available to it.

2. Once the plan and implementing procedures are approved by the NRC, the NUREG does not describe the methodology for making changes to the plan. The NRC should specify a formal process for making changes to the program.

3. NUREG-0761 is very specific in some areas and very general in others. If the NUREG is intended to be a single-source document for radiation protection, it needs more definition on the part of the NRC.

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Specific Comments

1. pg. 19, (4)(C) - The need for a separate qualification folder is unnecessary.

2. pg. 22, (3) - Review of personnel exposures at 1.5 rem is arbitrary and will cause an unwarranted administrative burden. 3.0 rem (the quarterly limit) would be more appropriate.

3. pg. 23, (7) - The range of dosimeters should not be required to respond to 6 Mev if the licensee uses administrative controls to prevent personnel from entering N-16 areas.

4. pg. 23, (9) - A lower limit should be established for when a dose calculation should be made for skin contamination.

5. pg. 27, (3)(d) - The present NRC accepted practice is to do this comparison at 500 mrem. Lowering the limit to 100 mrem is arbitrary and will cause an unwarranted administrative burden.

6. pg. 30, Sect. 6 - A firm definition of "Radioactive Material" is needed.

7. pg. 33, 7b(2)(b) - Low dose rates should be defined.

8. pg. 35, (2)(b) - 0.1 mR/hr on protective clothing is arbitrary and well below industry practice. If implemented, wasted protective clothing will increase the radwaste volumes. If paper anti-Cs are used, the licensee will have to have incineration capabilities.

9. pg. 36, (3)(e) - This requirement is beyond the state-of-the-art for available instruments.

10. pg. 36, (3)(f) - "Very sensitive" is not defined.

11. pg. 38, 8b(2)(a) - Instruments cannot be calibrated fully in accordance with ANSI N323-1978.

12. pg. 39, (3)(b) - "Functional" check appears to be incorrect. Channel check appears to be the proper terminology. Otherwise the frequency is not consistent with Appendix I, Technical Specifications.

13. pg. 40, (2)(b)&(c) - Not all utilities use continuous air monitors for surveys or for establishing MPCs; therefore, they should not be included here.

14. pg. 51, 2.j - It appears that this section deals with dosimeters. This should be clarified.

We trust these comments are suitable for your use and if you have any questions of this material, please contact our staff.

Yours very truly,

E. E. Utley
Executive Vice President
Power Supply and
Engineering & Construction

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