



**Consumers
Power
Company**

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PROPOSED RULE **PR-Misc. Notice**
(Reg Guide)

The following comments concerning the second proposed Revision 4 to Regulatory Guide 8.8, "Information Relevant To Ensuring That Occupational Radiation Exposures At Nuclear Power Stations Will Be As Low As is Reasonably Achievable (ALARA)", are presented for your consideration:

1. Section C.1, page 10 - The last sentence of this section should be modified for clarity to state, "This program should be considered in the development of the ..." in lieu of "combined with". The intent is to factor the program philosophy into all facets of plant design and operation in lieu of literally duplicating the written program into numerous plant documents.
2. Section C.1.2, page 10 - In the first paragraph of this section, the numerical guidance for implementing ALARA committee review is both arbitrary and excessive. Assigning an arbitrary numerical value can result in the mandatory repetitive review of routine maintenance tasks. On the other hand, the definition of "task" can be defined to such detail as to avoid any automatic review. We recommend that the radiation protection manager (RPM) as part of his responsibilities and authority assign numerical values for determining ALARA committee review and predetermine those tasks projected to be completed during the year which require committee review. This should be accomplished consistent with and in conjunction with the RPM establishing annual collective dose goals for the station.
3. Section C.1.2, page 11 - In the third paragraph of this page, Item 3 should be modified for clarity to state, "...corrective actions are taken consistent with ALARA when attainment...".
4. Section C.1.2, page 12 - In the third paragraph from the bottom of the page, Item 3 on establishing annual collective dose goals is not consistent with the wording of item 1 on the top of the previous page. We

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suggest modifying this item to state, "...this should include consideration for establishing...".

5. Section C.2, page 16 - In the second paragraph of this section, the assumption of 0.25 percent fuel clad defects for PWR's is unjustifiable based on recent operating experience. As an example, recent B&W design plant experience would indicate that 0.03 percent fuel clad defects would be a more reasonable number for assessing the quantity and isotopic composition of anticipated radioactive materials. Correspondingly, actual plant performance or historical data from similar design plants (whichever is more conservative) should be used in lieu of an arbitrary value in assessing design concepts or plant modifications. This section should be modified accordingly.
6. Section C.2.2, page 19 - Routine personnel exposure to radiation from pipes carrying radioactive material can also be reduced by routing the subject piping through inaccessible and already designated high radiation zoned areas. Item 6 of this section could be expanded to note this consideration.
7. Section C.4.3, page 36 - Item 3 should be reworded for clarity to read, "Digital - Integrating Audible - Alarm Dosimeters (see Regulatory Guide 8.28);".

Please consider these comments in future actions concerning this guide.

G.S. Keeley for T.W. Cook

DAS

CC: RJCook
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