

CP&L

Carolina Power & Light Company

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Route 1, Box 327
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August 18, 1982

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

DOCKET NUMBER PR-50
PROPOSED RULE (47 FR 19543)

Dear Sir/Madam:

Reference: 47 FR 27371 Part 50, Proposed Rule Making

Proposed rules on submission of LERs would require a report for:

"(7) Any radioactive release that requires the evacuation of a room or building."

This statement is not sufficiently specific for the site health physicist to ensure he is in compliance with the requirements unless he reports every instance where respirators are required for work in an area. For instance, the mechanics may be working on a valve packing and the airborne levels start increasing. The health physicist pulls the mechanics out of the room and requires respiratory protection for them to reenter the room and continue the job. While I do not believe this event is required to be reported under the proposed rule, I do not have confidence that many of the NRC inspectors would interpret the requirement in the same way.

Perhaps the item could be reworded to give more specific guidance on the events that should be reported. Some suggested wording for your consideration is as follows:

(7) Any radioactive release that requires the evacuation of a room or building and results in a local emergency being declared in accordance with the site emergency plan.

Your consideration of these comments is appreciated.

Very truly yours,

J. A. Padgett
Principal Specialist
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Acknowledged by card