

ARIZONA

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August 16, 1982

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VICE PRESIDENT
ELECTRIC OPERATIONS

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

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

DOCKET NUMBER
PROPOSED RULE

*PR-Misc. Notice
(Reg Guide)*

Attn: Docketing and Service Branch

Subj: Comments on Draft Regulatory Guide 8.8 (Revision 4)
"INFORMATION RELEVANT TO ENSURING THAT OCCUPATIONAL
RADIATION EXPOSURE AT NUCLEAR POWER STATIONS WILL BE
AS LOW AS IS REASONABLE ACHIEVABLE (ALARA)"

We are in agreement with the Draft Regulatory Guide as a whole and with most of the revised sections. However, we would like to comment on the revisions in the following sections:

Page 11 - Section 1.2, #1: "...consideration should be given to establishing annual collective dose goals."

Page 12 - Section 1.2, #3: "...establishing annual collective dose goals for those activities that can reasonably be projected during the coming year."

Page 13 - Section 1.2, #7: "...establishing a monthly ALARA dose budget and job specific dose goals."

In each of these revised sections there is mention of an "annual dose goal" or "monthly dose budget". The development of numerical dose goals to keep radiation exposures ALARA would require large amounts of manpower which would be neither cost-effective nor an efficient use of trained personnel. We agree with the following statement from Regulatory Guide (Revision 3 - June 1978) 8.8, 8.3-3:

When an adequate data base, including economic information, is available, the criteria for keeping annual collective doses to station personnel ALARA might be derived or selected in numerical terms. However, a data base of operating experience and cost information to provide quantitative guidance for establishing such criteria is not available at this time, and the criteria for meeting the provision of Paragraph 20.1(c) of 10CFR Part 20 must therefore take the form of qualitative guidance (e.g., goals, guidance, and statements of good practice).

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Acknowledged by card. *8/27/82 imp*

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August 16, 1982
NOS 82-769
Page 2

It now appears that the NRC believes that quantitative goals (i.e., numerical criteria) can be derived or selected for use in an ALARA program. It is not clear how the data base of operating experience and cost information has so improved in the past four years (since Regulatory Guide 8.8, Revision 3) to allow development of quantitative criteria where only qualitative criteria was possible before. To our knowledge, no new information has been compiled since 1978 that was not known from all the previous years of operating experience.

ALARA is a concept requiring good engineering and radiation protection procedures and preparation, not simply meeting a numerical dose value or limit. The meeting of a certain annual goal or budget would not ensure that the concept of ALARA was being met.

On Page 13 - Section 1.2, #7: "...establishing...job-specific dose goals" should be changed to say "...establishing...job-specific dose goals for jobs with significant exposure potential".

Also there is an error on page 6 - Section 3, Paragraph 2: "zirconium-65" should be "zinc-65".

Thank you for the opportunity to comment on this proposed Regulatory Guide.

Sincerely,

G Carl Andognini /SRF

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GCA/JRP/jc

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