

NUC

nuclear utility construction

DOCKETED

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August 19, 1982

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

*Misc. Notice
(Reg Guide)*

Attention: Docketing and Service Branch

Subject: Review of "Second Proposed Revision to Regulatory
Guide 8.8"

Dear Sirs:

Nuclear Utility Construction is pleased to present its view on the subject Regulatory Guide. We have specifically geared our review to Item 3.1.16 on page 33 concerning underwater diving techniques. Due to the recent overexposure of one of our divers, Reference IE information notice No. 82-31 and our being made aware of IE information notice No. 81-26, Part 3, Supplement No. 1, we have rewritten our procedure MTH-80-0004, Procedure for Underwater Diving Work Associated with Contaminated Water.

We have included the corrective actions indicated in 82-31 and additional requirements that we feel are necessary in our procedure. We also changed the position of the "leg area" TLD placement from the back of the calf to the "mid thigh area" to cover the thigh and gonads. This is a change to our March 30, 1982 correspondence with Mr. R. E. Alexander, Chief Occupational Radiation Protection Branch. We qualify this change by the aforementioned IE notice 81-26.

Specifically our comments would be that since Item 3.1.16 recommends the use of underwater diving techniques, you should include guidelines on the procedure requirements and nuclear diving personnel qualifications. Although procedure MTH-80-0004 is in itself proprietary, Nuclear Utility Construction would be willing to work with you in establishing guidelines for nuclear diving based on this procedure. See Attachment A.

*DS09
add: Ed Hill
5650 NL*

Acknowledged by card *8/27/82 emp*

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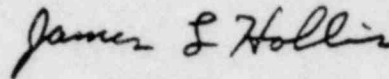
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In the same light, we are presenting our minimum requirements for Qualification of Nuclear Diving Personnel. This is not proprietary and we submit this for your consideration as Attachment B.

Should any questions come up concerning this correspondence, Nuclear Utility Construction would be happy to address those questions.

Sincerely,

NUCLEAR UTILITY CONSTRUCTION



James L. Hollis
Vice President/Chief Engineer

JLH/jk

cc: Mr. A. K. Roecklein - with attachments

Attachment A: Procedure MTH-80-0004 Revision 4 - August 17, 1982
Attachment B: Qualification of Nuclear Diving Personnel