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(59 FR 5132)

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Tennessee Valley Authority, 1101 Market Street, Chattanooga, Tennessee 37402-2901

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March 22, 1994

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

Mr. Samuel J. Chilk
Secretary of the Commission
ATTN: Docketing and Service Branch
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Dear Mr. Chilk:

NUCLEAR REGULATORY COMMISSION (NRC) - REQUEST FOR COMMENT ON PROPOSED
RULEMAKING 10 CFR PARTS 19 AND 20, RADIATION PROTECTION REQUIREMENTS -
AMENDED DEFINITIONS AND CRITERIA

The Tennessee Valley Authority (TVA) has reviewed the subject proposed
rulemaking, which was noticed in the February 4, 1994 Federal Register
(59 FR 5132-5138), and is pleased to provide the following comments.

General Comment:

For TVA nuclear facilities, the proposed revision would impose
significant impact with little benefit. Impact would include revisions
to (1) technical specifications, (2) Offsite Dose Calculation Manuals,
(3) site and corporate standards and procedures, 4) Final Safety
Analysis Reports, (5) emergency action levels, and 6) monitor setpoints.

TVA recommends that the Unrestricted Area, Restricted Area, and
Controlled Area definitions and concepts be retained in the regulation
as presently written.

Specific Comments:

19.12 - Instructions to workers

- (a) All individuals who in the course of employment in which the
individual's assigned duties involve the potential for exposure to
radiation and/or radioactive material shall be . . .

". . . potential for exposure to radiation. . . ."

Comment: Use of the public dose limit (100 mrem/year) as a criterion
to indicate "potential for exposure" and thus require
training, is ambiguous. A clear definition of what
constitutes "potential for exposure" that requires training
is needed.

20.1003 - Definitions

Member of the public means . . .

Comment: Revised definition is acceptable.

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Occupational dose means . . .

Comment: The proposed definition of "occupational dose" implies that it includes all dose received by individuals performing any type of work assigned by the licensee or contractor of the licensee regardless of location. Dose received by individuals on nuclear plant sites outside of normally restricted areas (i.e., outside of Radiologically Controlled Areas or Protected Areas) is typically a fraction of the public dose limits (100 mrem/year). Tasks such as mowing grass or working in office buildings are examples of "work" performed in these areas. Training and monitoring of workers in these areas are impractical and not cost effective. The new "occupational dose" definition should exclude dose received as discussed above.

Public dose means . . .

Comment: Revised definition is acceptable.

Unrestricted area means . . .

Comment: Following the new definition will require either moving the effluent boundary (which is the Unrestricted Area boundary) to the existing Restricted Area boundary or moving the Restricted Area boundary to the existing Unrestricted Area boundary. If the effluent boundary is moved, all operational flexibility for effluent releases (per 10 CFR 50, Appendix I) will be lost. All effluent calculations will require revision (e.g., monitor setpoints, Offsite Dose Calculation Manual, Emergency Action Levels, and Final Safety Analysis Reports). If the Restricted Area boundary is moved, unwarranted training and monitoring requirements may be imposed based on proposed new definition of "occupational dose." We strongly recommend leaving the existing definition in place and retaining the "Controlled Area" concept.

20.1301 - Dose limits for individual members of the public

(b) If the licensee permits members of the public to have access to restricted areas . . .

Comment: If the revised definitions are imposed, licensee procedures must be revised. We recommend leaving definitions as now prescribed.

20.1302 - Compliance with dose limits for individual members of the public . . .

(a) The licensee shall make or cause to be made, as appropriate, surveys of radiation levels in unrestricted areas and . . .

Comment: We suggest this section should read, "The licensee shall make or cause to be made, as appropriate, surveys of radiation levels in restricted and unrestricted areas and radioactive materials in effluents"

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20.1801 - Security of stored materials

The licensee shall secure from unauthorized removal . . .

Comment: Removal of "controlled area" from this section is the only change. As stated previously, our recommendation is to retain this concept.

20.1802 - Control of material not in storage

The licensee shall control and maintain constant surveillance of licensed material . . .

Comment: Removal of "controlled area" from this section is the only change. As stated previously, our recommendation is to retain this concept.

20.2104 - Determination of prior occupational dose

(a) For each individual who is likely to receive . . .


Comment: Change has no impact on licensee programs or procedures.

20.2205 - Reports to individuals of exceeding dose limits

When a licensee is required, pursuant to the provisions of . . .

Comment: This requirement is new. Its addition will require licensee procedures to be revised. We do not recommend inclusion of this requirement.

Sincerely,



for Bruce S. Schofield
Manager

Nuclear Licensing and Regulatory Affairs

cc: Mr. R. V. Crlenjak, Chief
U.S. Nuclear Regulatory Commission
Region II
101 Marietta Street, NW, Suite 2900
Atlanta, Georgia 30323

Mr. Alan K. Roecklein
Office of Regulatory Research
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Mr. Thomas E. Tipton
Nuclear Management and Resources Council
1776 Eye Street, NW
Suite 300
Washington, DC 20006-3706