

**COLUMBIA GAS**

Transmission



March 18, 1994

19, 20  
(59 FR 5132)

(4)

DOCKETED  
USMRC

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

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Attention: Docketing and Service Branch

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

Re: Proposed Rule Regarding Radiation Protection Requirements; Amended Definitions and Criteria

Dear Sir or Madam:

Columbia Gas Transmission Corporation (Columbia Transmission) offers the following comments concerning the referenced proposed rule. Columbia Transmission, a Delaware Corporation with headquarters in Charleston, West Virginia, is a wholly-owned subsidiary of The Columbia Gas System, Inc. It is primarily engaged in the transmission and storage of natural gas in interstate commerce for affiliated and non-affiliated companies and other shippers in eleven states and the District of Columbia. It is one of the largest interstate natural gas pipeline companies with 43 underground storage fields, approximately 12,400 miles of transmission pipeline and approximately 6,500 miles of gathering pipeline.

Columbia generally supports the proposed rule, and believes it will help clarify the intent of Parts 19 and 20 without adding significant burden to most licensees. One area needs further clarification, however. In the "Background" section in "SUPPLEMENTARY INFORMATION", §19.12 is discussed. An example is used of an individual in the vicinity of the radiation whose duties "were not assigned by the licensee or a licensee contractor" and is to be regarded as "a member of the public" for purposes of radiation exposure control; "the Commission believes training is not required". A second example states that a worker who has the potential to be exposed to radiation "during the course of employment with the licensee or a contractor to the licensee" is to receive an appropriate degree of training.

This distinction of employment is proper and crucial to the rule's application. **It must remain the responsibility of the licensee** to protect workers who happen to be in the area but who are not working for the licensee. §19.12 is not particularly clear in this area, however.

I suggest that the wording of §19.12 be reexamined. A change such as the following might be appropriate to clarify who is responsible for protection from unnecessary radiation:

"(a) All individuals who in the course of employment *with a licensee or a contractor to the licensee* in which ..."

If I may provide any further information, please feel free to contact me.

Sincerely,

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PDR PR  
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David E. Adler, Radiation Safety Officer

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