

PROPOSED RULE PR 19+20
(59 FR 5132)

DOCKETED

Omaha Public Power District
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Omaha, Nebraska 68102-2247
402/636-2000

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March 31, 1994
LIC-94-0072

Secretary, Docketing and Service Branch
U. S. Nuclear Regulatory Commission
Washington, DC 20555

References: 1. Docket No. 50-285
2. Federal Register Volume 59, No. 23, dated February 3, 1994

Dear Secretary:

SUBJECT: Comments from Omaha Public Power District (OPPD) on Proposed Changes to 10 CFR Parts 19 and 20 Regarding Radiation Protection Requirements

In Reference 2, the NRC solicited comments for proposed changes to 10 CFR 19 and 20 that would amend specific definitions and criteria. OPPD has the following comments regarding the proposed rule.

The proposed changes to the "member of the public" definition and dose limits would require that any individual inside the plant's restricted area who receives any non-occupational exposure be treated as a member of the public. This change would limit non-occupational exposed workers to no more than 100 mrem/yr of public dose. This is significant because the present guidance states that anyone in the restricted area is an occupational worker; if a person is not likely to exceed 500 mrem (10% of the occupational dose limit), radiation monitoring is not required. Therefore, it is not presently necessary to provide dosimetry to visitors, clerical, or warehouse personnel at Fort Calhoun Station (FCS). The proposed change may be interpreted to require monitoring of all people in the restricted area, and possibly onsite, in order to comply with the dose limits.

OPPD recommends adding the following wording to clarify dose limit compliance:

The licensee must show by survey, measurement, calculation, or prospective evaluation that a member of the public is not likely to exceed 100 mrem/yr within the restricted area.

In using these different techniques a licensee can demonstrate compliance without compromising radiological safety. During implementation of the new 10 CFR 20, most licensees have shown by prospective evaluation that personnel in the controlled area are not likely to exceed 100 mrem/yr. In addition, nuclear power plant licensees are required by 10 CFR 50 Appendix I to maintain exposures As Low as Reasonably Achievable (ALARA).

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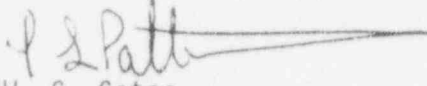
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Implementation of this proposed rulemaking at FCS would require numerous procedure changes, additional dosimetry for "members of the public," and changes to chemical effluent release software due to the deletion of the term "controlled area." A preliminary estimate of the implementation costs for the proposed rulemaking is approximately \$157,000 the first year and \$65,000 annually thereafter.

Implementation of this proposed rulemaking would provide minimal net benefit to radiological safety at FCS, and therefore is not considered cost effective. Based on the effectiveness of existing radiation protection programs at nuclear power plants in protecting the health and safety of the public, consideration should be given to exempting from the proposed rule those licensees subject to the requirements of 10 CFR 50.

Please contact me if you have any questions.

Sincerely,



for
W. G. Gates
Vice President

WGG/mah

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