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Regulatory Publications Branch, DFIPS  
Office of Administration  
U. S. Nuclear Regulatory Commission  
Washington D. C. 20555

Dear Sirs:

Thank you for the opportunity to review Draft Regulatory Guide DG-8008. The U. S. Navy considers one change necessary concerning internal and external exposure considerations during planned special exposures. The U. S. Navy comment is provided in enclosure (1).

If there are questions concerning our comments please contact Commander Roby Enge at (703) 602-2582.

  
J. W. MALINOSKI

CAPT MSC USN

Executive Secretary

Navy Radiation Safety Committee

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NAVY COMMENTS ON NRC DRAFT REGULATORY GUIDE DG-8008  
PLANNED SPECIAL EXPOSURES

1. The Navy does not agree with the philosophy in paragraph 3, Internal and External Exposure Considerations. This paragraph states: "This requires controlling the total effective dose equivalent, but permits tradeoffs between internal and external exposures to be made to achieve ALARA doses....If the use of respiratory protection equipment limits the mobility of personnel, limits their ability to work efficiently in small confined areas, and could result in their receiving much higher external doses than the internal doses saved, it may be prudent to perform the work without respiratory protection equipment."

Inherent in the work situations described is a reduced ability to engineer the control of intakes of radioactivity. At the allowed levels of external exposure, the risk associated with controlling the intake of radioactivity, the adverse psychological impact on workers (exposure continues even though the job is complete), and the added cost of performing and interpreting bioassay measurements do not offset the minor savings in total effective dose.

The Navy recommends deleting this paragraph.

Enclosure (1)