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United States Nuclear Regulatory Commission
Regulatory Publications Branch, DFIPS
Washington, D.C. 20555

Subject: Comments on Draft Regulatory Guide DG-8003, DG-8004, DG-8005, and DG-8006

Gentlemen:

The attached comments are submitted by Toledo Edison in response to the request of the U.S. Nuclear Regulatory Commission (NRC) for comments on Draft Regulatory Guides DG-8003, DG-8004, DG-8005, and DG-8006. These Draft Regulatory Guides are intended to assist in implementation of the requirements of the revision to 10 CFR Part 20, "Standards for Protection Against Radiation," that was published in the Federal Register (56 FR 23360) on May 21, 1991.

Toledo Edison, a subsidiary of Centerior Energy, is partial owner of and is responsible for operation of the Davis-Besse Nuclear Power Station. Toledo Edison has been authorized for power operation of the Davis-Besse Nuclear Power Station since April 1977. As a 10 CFR 50 licensee, Toledo Edison has a vested interest in any policies the NRC may adopt which can affect the management and operation of a commercial nuclear power plant.

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Please refer any questions regarding these comments to Mr. R. W. Schrauder at (419) 321-2366.

Very truly yours,

T J Sp for DC Shelton

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Attachments

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Comments On Draft Regulatory Guide DG-8003
Proposed Revision 1 To Regulatory Guide 8.25
Air Sampling In The Workplace

GENERAL COMMENTS

The proposed revision to Regulatory Guide 8.25 recommends specific air sampling practices which are not suited to the commercial power reactor industry. The guidance in this draft is directed at installations with a factory and/or production laboratory environment where better air sampling techniques may be required. These sampling techniques are not necessary for operating commercial nuclear power plants since power reactor licensee's technical specifications and operating procedures already prescribe adequate air sampling requirements. Therefore, the proposed revisions to Regulatory Guide 8.25 would be more appropriately incorporated as revisions to the following Regulatory Guides.

- Regulatory Guide 8.21, "Health Physics Surveys for By-product Material at NRC-Licensed Processing and Manufacturing Plants".

  Regulatory Guide 8.24, "Health Physics Surveys During Enriched Uranium-235 Processing and Fuel Fabrication".

- Regulatory Guide 8.30, "Health Physics Surveys in Uranium Mills".

The above Regulatory Guides discuss air sampling in general terms and could be improved by adding the in-depth guidance contained in this draft. The existing Regulatory Guide 8.25 should be maintained as a general guide which applies to all licensees. The following comments are made in support of this position.

SPECIFIC COMMENTS

Section C.1.2 - Hazard Index

While the concepts in the proposed Hazard Index are useful, when properly calculated, they are applicable only to new facilities; facilities with relatively fixed work locations; or facilities where historical air sampling data is not available. None of these criteria apply to power reactor facilities. Guidance which is intended to be applicable to all licensees should not include directions to use and document an analytic method which is not applicable to all licensees. Therefore, either reference to Hazard Indices should be deleted, or a categorical exemption should be placed in the Regulatory Guide stating which classes of licensees are not required to perform Hazard Index analyses.

Section C.4 - Early Warning Air Sampling

Airborne radioactivity concentrations sufficiently elevated to cause immediate harm are detectable by the installed monitoring systems of commercial nuclear power plants. These systems are required by Technical Specifications and are operated according to written procedures. Unless power reactors are expected to duplicate monitoring systems and/or records, this guidance does not apply.

Therefore, either the requirements for additional early warning monitoring should be deleted, or a clear exemption should be placed in the Regulatory
Guide stating which classes of licensees are not required to install and/or document additional monitors.

Section C.4.2 - Airflow Patterns

The sections concerning airflow pattern determination and/or observation are applicable to facilities with fixed work station and relatively fixed locations of vents and ducts. Neither of these concepts apply directly in a commercial nuclear power plant, where air flow patterns can change from day to day (in some cases hourly). Determination of air flow patterns are performed for tasks for which no historical data is available on a case by case basis. A formal program with fixed frequency of testing and the associated documentation would be unwieldy if not impossible. These requirements apply to fabrication, processing milling and production facilities but not to commercial power reactors. Guidance which is to be applicable to all licensees, should not include instructions to use, document and analyze the results of a methodology which is not directly applicable to some of the licensees. Therefore, these instructions should be preceded by a clear statement of their non-applicability to power reactors.

Conclusion

The revision to Regulatory Guide 8.25 and the supporting work (NUREG-1400 and NUREG/CR-0006) provide much useful information. The guidance provided to use this information is not, however, directly applicable to commercial power reactor licensees. It should be modified to clearly and categorically state that it does not apply to these licensees. Failing this, the revision should be withdrawn.

Comments On Draft Regulatory Guide DG-8004
Radiation Protection Programs For Nuclear Power Plants

GENERAL COMMENTS

Toledo Edison has reviewed Draft Regulatory Guide DG-8004, Radiation Protection Programs for Nuclear Power Plants. Based on review of this document, the Company does not believe issuance of the proposed Regulatory Guide is necessary. The proposed Regulatory Guide restates existing requirements which can be found in Technical Specifications, existing Regulatory Guides, and consensus standards. The proposed Regulatory Guide provides no new information and remains vague on questions such as an appropriate self-audit frequency.

Comments On Draft Regulatory Guide DG-8005
Assessing External Radiation Doses From Airborne Radioactive Materials

GENERAL COMMENTS

Toledo Edison reviewed Draft Regulatory Guide DG-8005, Assessing External Radiation Doses From Airborne Radioactive Materials. Based on Review of this document, the Company does not believe issuance of the proposed Regulatory Guide is necessary for power reactor licensees. The requirements of the draft guide are routinely performed by these licensees. The existing programs within the nuclear power industry as a whole, and at Davis-Besse in particular, adequately address these issues.

Comments On Draft Regulatory Guide DG-8006
Control Of Access To High And Very High Radiation Areas
In Nuclear Power Plants

GENERAL COMMENTS

Toledo Edison has revieved Draft Regulatory Guide DG-8006, Control Of Access To High And Very High Radiation Areas In Nuclear Power Plants. Based on review of this document, the Company believes that the Draft Guide is acceptable with one exception. The following discussion details Toledo Edison's recommendation.

SPECIFIC COMMENTS

Section C. Regulatory Position 1. General

The proposed definition of accessible area as "one that can reasonably be occupied by a significant portion of an individual's body" is not specific enough. As written, it will result in the need for case by case evaluations by licensees. Toledo Edison suggests that accessible area be defined as one that can be occupied by an individual's trunk.