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Bill Morris
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STATE OF ILLINOIS
DEPARTMENT OF NUCLEAR SAFETY

1535 OUTER PARK DRIVE
SPRINGFIELD, IL 62704
(217) 795-9900

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THOMAS W. ORTIGER
DIRECTOR

JIM EDGAR
GOVERNOR

March 31, 1992

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

Re: Draft Regulatory Guide DG-8010 "Criteria for Monitoring and Methods for
Summation of Internal and External Occupational Doses"

Gentlemen:

The Illinois Department of Nuclear Safety (Department) hereby submits its comments on the above-identified proposed draft regulatory guide. The proposed guide provides acceptable criteria that may be used by licensees to determine whether monitoring is needed and methods for calculating and summing external and internal doses to demonstrate regulatory compliance.

The discussion on the criteria for monitoring is clear and simple. However, the Department has one comment regarding the determination of organ-specific Committed Effective Dose Equivalent. In regulatory position 4.1, the Commission states that the preferred method for calculating organ-specific dose equivalent is to use the factors in Federal Guidance Document No. 11, an EPA document many licensees have never heard of before. More licensees are likely to have a copy of ICRP 30 and the equivalent dose conversion factors found in that document. Therefore, the Department suggests that the regulatory guide include a statement that the factors in ICRP 30 are also acceptable.

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In general, the Department agrees with the proposed guide. If you have any questions regarding these comments, do not hesitate to call me or Bruce Sanza at (217) 785-9947.

Sincerely,

A handwritten signature in cursive script that reads "Steven C. Collins".

Steven C. Collins, Chief
Division of Radioactive Materials

SCC:BJS:bs

cc: B.J. Holt
Lloyd Bolling