Bill Morris
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**CENTERIOR
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United States Nuclear Regulatory Commission
Regulatory Publications Branch, DFIPS
Washington, D.C. 20555

Subject: Comments On Draft Regulatory Guides DG-8010 and DG-8011

Gentlemen:

The comments included in this letter are submitted by Toledo Edison in
response to the request of the U.S. Nuclear Regulatory Commission (NRC)
for comments on Draft Regulatory Guide DG-8010, Criteria for Monitoring
and Methods for Summation of Internal and External Occupational Doses
and Draft Regulatory Guide DG-8011, Radiation Dose to the Embryo/fetus.
These Draft Regulatory Guides are intended to assist in implementation
of the requirements of the revision : 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.

Based on a review of Draft Regulatory Guides DG-8010 and DG-8011, the
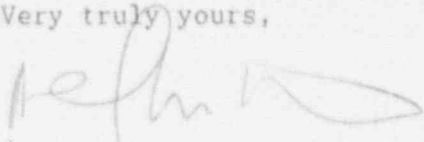Company finds these documents acceptable as written.

Operating Companies
Cleveland Electric Illuminating
Toledo Edison

Please refer any questions regarding these comments to
M₁. R. W. Schrauder at (419) 249-2366.

Very truly yours,

MAT/dlm

cc: A. B. Davis, Regional Administrator, NRC Region III
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