



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

APR 22 1985

Mr. James L. Hollis
Vice President & Chief Engineer
Nuclear Utility Construction
4711 126th Avenue North
Clearwater, Florida 33520

Dear Mr. Hollis,

This letter responds to your March 29 letter to my staff health physicist, James Wigginton. In your letter you relate that several of your clients seem to feel that Inspection & Enforcement (IE) Information Notice 84-61, Overexposure of Diver in Pressurized Water Reactor (PWR) Refueling Cavity, discourages the use of divers due to the possibility of exposures. That was not our intent and we do not believe it is a correct reading of the notice.

As a result of the second exposure incident involving diving operations, and with the apparent lack of preventative effect of Information Notice 82-31, Overexposure Of Diver During Work In Fuel Storage Pool, IE decided to attempt to develop guidelines "... to help licensees properly control and manage underwater work to prevent overexposures". Formulated from the technical input of the NRC Regions, headquarters Program Offices, and pertinent feedback from several commercial diving concerns (including NUC), this guidance was issued as IN 84-61. The clear intent was to help prevent further personnel exposures in excess of regulatory limits, and not to discourage the generic use of divers when adequate radiological controls and proper management oversight are in effect. The need for effective controls and a high degree of oversight in the unforgiving underwater environment, as you know, results from the unique nature of the underwater workplace itself. The otherwise beneficial water shielding effect brings with it high dose rate gradients and attendant radiation survey difficulties.

We continue to believe that the diving option should continue to be a viable way to effectively perform many exposure intensive maintenance tasks. The nuclear industry has demonstrated the obvious person-rem savings and economic benefits that diving can bring. As long as industry continues to recognize water as a "double-edged sword," offering person-rem savings but always the potential for serious overexposures in very short time periods, diving should continue to provide benefits to workers and industry.

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PDR I&E
MISC PDR

Mr. James L. Hollis

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We hope we have cleared up any confusion as to OIE's intent in issuing IN 84-61 and thank you for your responsive feedback.

Sincerely,

Original Signed By

Robert L. Baer, Chief
Engineering and Generic
Communications Branch
Division of Emergency Preparedness
and Engineering Response, IE

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* NOTE of RECORD :

Copies of 4/22 BAER → HOLLIS memo, as well as the Incoming NUC letter were sent to all diving concerns listed in "nuclear news" Buyer's guide.

*DEPER: IE
JWigginton
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Jim Wigginton

Mr. James L. Hollis

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