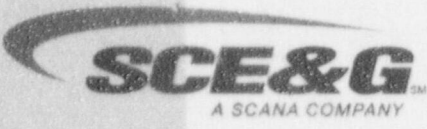


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J. Craig

63FR 40141  
July 27, 1998



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US NRC

September 28, 1998  
RC-98-0176

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Mr. David L. Meyer  
Chief, Rules Review and Directives Branch  
Mail Stop T-6 D69  
Office of Administration  
United States Nuclear Regulatory Commission  
Washington, DC 20555-0001

Stephen A. Byrne  
General Manager  
Nuclear Plant Operations

Dear Mr. Meyer:

Subject: VIRGIL C. SUMMER NUCLEAR STATION  
DOCKET NO. 50/395  
OPERATING LICENSE NO. NPF-12  
DRAFT REGULATORY GUIDE, DG-8022, COMMENTS

South Carolina Electric and Gas submits the attached comments on the Draft Regulatory Guide, DG-8022, "Acceptable Programs For Respiratory Protection."

SCE&G appreciates the opportunity to provide comment on this proposal. If you have any questions regarding this matter, please contact Mr. Ricky Myers at 803-345-4384.

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Jenkinsville, South Carolina  
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Very truly yours,

Stephen A. Byrne

RAM/SAB/dr  
Attachment

- c: J. L. Skolds
- W. F. Conway
- R. R. Mahan (w/o attachments)
- R. J. White
- L. M. Padovan

NRC Resident Inspector  
L. A. Blue  
RTS (REG 980007)  
File (811.05)  
DMS (RC-98-0176)

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## Comments Draft Reg. Guide, DG-8022

### **Section 4.3, Inventory, Inspection, and Storage, 3rd paragraph:**

Specifies that Emergency SBCAs should be donned and operability tested at least quarterly.

It is not necessary to don an SCBA to determine its operability. This interpretation would consume excessive resources in both time to perform the test as well as waste air with the additional burden of refilling the bottles. Please strike the words "donned and" from the sentence "Emergency respiratory protection equipment (SCBA) should be donned and operationally tested frequently (at least quarterly).

### **Section 5.3, Fit Testing, 6th paragraph:**

The reference to 29 CFR 1910.1001 on asbestos is no longer applicable in reference to OSHA's latest revision to this regulation. It would be better to include a caution concerning the differences between 10 CFR 20 and other Federal regulations as part of paragraph 3 of this same section, when discussing the exception to the recommendations of ANSI Z88.2-1992.

### **Section 3.5, Supervisory Requirements, and Section 5.3, Fit Testing:**

The requirements in these sections differ from the requirements of other Federal regulations, particularly 29 CFR 1910. This can place an additional administrative burden on licensees to track respirator qualification through differing programs to meet the conflicting Federal regulations. There is a resultant increase in the potential for misapplication of the inconsistent regulations to particular situations requiring the use of respiratory protection. In most circumstances adherence to either the non-radiological or radiological respiratory protection regulations would provide adequate safeguards to individuals. There is no justification for the additional administrative burden to track qualifications in compliance to differing sets of regulations.

While it is encouraging that the NRC has attempted to be less restrictive in its regulation, it is suggested that in the future, differing Federal regulators attempt to work together to provide consistent regulations, especially in areas where jurisdiction can easily overlap.