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DEPARTMENT OF NUCLEAR SAFETY

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217/785-9900 • 217/782-4421 (TDD)

George H. Ryan
Governor

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Director



April 3, 2001

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Directives

Jim Myers
Chief, Rules and Directives Branch
U.S. Nuclear Regulatory Commission
Mail Stop 16-D59
Washington, DC 20555-0001

Re: Draft Regulatory Guide NUREG 1736 "Consolidated Guidance: 10 CFR 20 - Standards for Protection Against Radiation."

Dear Mr. Myers:

The Illinois Department of Nuclear Safety (the Department) hereby submits its comments on the referenced Draft Regulatory Guide. This document consolidates previous guidance relating to NRC Part 20 and discusses how the guidance should be applied. NUREG 1736 is a great improvement over previous guidance on this subject and serves as a quick reference for radiation protection issues. The following are comments that the Department submits for your consideration to further improve this document:

1. Section 3.20.1201(f), page 3-37, indicates that each employer is required to reduce the dose that an individual may receive by the amount of the occupational dose received at another facility while under the employ of another. NRC should provide examples where this may occur for clarification.
2. In regards to Section 3.20.1204(a)(b), page 3-46, for determination of internal exposure, the referenced NUREG 1400 does not help to determine the frequency of bioassay measurements. NUREG 1400 aids in determining how to make measurements of airborne radionuclides. NRC should insert the correct reference here.
3. Some outdated regulatory guidance is identified on page 3-47. It would be useful to create an all-inclusive appendix of all outdated guidance documents to be added at the end of the guide.
4. In regards to Section 3.20.1302, page 3-69, many licensees have modeling programs that can reasonably estimate exposure to members of the public. Acceptable methods should be identified. Most licensees can only demonstrate exposures at the release point in order to meet the criteria and do not have the resources to perform complex modeling. Allowances should be made to provide for this option.



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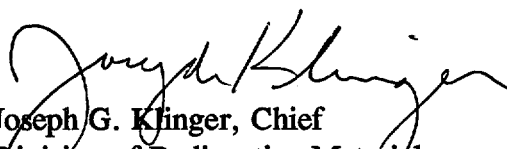
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5. The "institutional control" concept for decommissioned sites, addressed on page 3-77, appears to be in practice only at power stations and waste sites and should be designated as such. This provision should not be afforded to all licensees.
6. In Section 3.20.1501(c), page 3-90, the National Voluntary Laboratory Accreditation Program (NVLAP) does not address exchange frequency of dosimeters or how the exchange frequency could be extended beyond the industry norms. Guidance should be provided in this section to address the frequency of exchange.
7. In regards to Section 3.20.1601, pages 3-98 & 99, neither this section nor the list of relevant guidance indicates that the testing of control devices is required. Testing of control devices and the necessary documentation should be added to this section.
8. In regards to Section 3.20.1703, page 3-126, guidance statements on this page should include references to NIOSH regulations, or at a minimum indicate that they do not supercede NIOSH regulations.
9. In regards to Section 3.20.1901 (b), page 3-135, the existing regulatory language allows for exceptions to the standard radiation symbol for color when used in high temperature environments. This discussion should be expanded to include other harsh environments (i.e., chemical) where stamped or etched labels would have more longevity.
10. In regards to Section 3.20.1902, page 3-137, it appears that the intent of the requirement is that individuals be adequately informed of hazards present. This needs to be included in the guidance statement, statement of applicability or discussion sections.
11. In regards to Section 3.20.1906, page 3-147, Table 1906.1 should be modified to move the damaged package entry to the top of the table. It should be amended to read "any damaged package" for clarification. This change should be made to all NUREG 1556 guidance documents
12. In regards to Section 3.20.2001, page 3-149, the last paragraph on this page states that D-I-S waste should not be an on-site storage option and that the NRC has additional requirements for on-site storage. None of this information is referenced in any of the supportive guidance. Additional requirements for decay in storage such as half-lives allowed, surveys and recordkeeping should be specified here.
13. In regards to Section 3.20.2110, page 3-179, it is unclear why this topic (Form of Records) is so vague with the advent of electronic media. NRC should develop detailed record media guidance.

14. In regards to Section 3.20.2202, page 3-183, it is implied that NRC does not have a notification requirement for exposures to members of the public. Guidance should be included in this document indicating when notifications to the regulatory authority about doses to the members of the public are required.
15. When will NRC have all referenced guidance available on the web or electronically? We understand that great strides have been made in this area, but many documents are still not available.
16. Some discussion of compatibility is necessary. Since Part 20 is considered a compatibility Category A regulation, a discussion of this and the numerous requirements herein should be discussed either in the "Foreword" or in the appropriate sections throughout this document.

Thank you for the opportunity to comment. Please contact me or Mr. Gibb Vinson at (217) 785-9947 if you have any questions.

Sincerely,

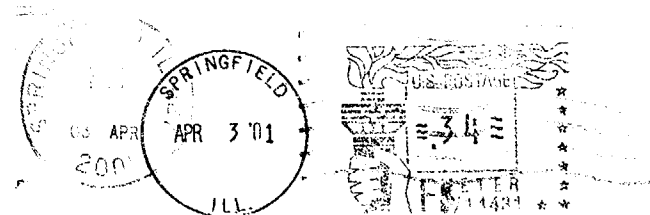

Joseph G. Klinger, Chief
Division of Radioactive Materials

CGV:kjg

cc: James Lynch, State Agreements Officer

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