

# PUBLIC SUBMISSION

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**Docket:** NRC-2013-0234

Monitoring Criteria and Methods to Calculate Occupational Radiation Doses

**Comment On:** NRC-2013-0234-0001

Monitoring Criteria and Methods to Calculate Occupational Radiation Doses

**Document:** NRC-2013-0234-DRAFT-0004

Comment on FR Doc # 2013-25258

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## General Comment

Wyoming Mining Association Comments on Regulatory Guide DG-8031 Monitoring Criteria and Methods to Calculate Occupational Radiation Doses. wma-comments-DG-8031  
See attached file(s)

## Attachments

wma\_comments\_DG-8031

SUNSI Review Complete

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December 20, 2013

Cindy Bladey,  
Chief, Rules, Announcements, and Directives Branch (RADB)  
Office of Administration  
Mail Stop: 3WFN, 06-44M  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

Dear Ms. Bladey:

**Subject: Wyoming Mining Association (WMA) Comments *DRAFT REGULATORY GUIDE DG-8031 MONITORING CRITERIA AND METHODS TO CALCULATE OCCUPATIONAL RADIATION DOSES* Federal Register / Volume 78, Number. 207 / Friday, October 25, 2013 / Notices, pages 64030 to 64031**

The Wyoming Mining Association (WMA) is an industry association representing mining companies, contractors, vendors, suppliers and consultants in the State of Wyoming. Among its mining industry members are uranium recovery licensees, including three (3) in-situ uranium recovery operators, a conventional uranium mill on standby, several companies planning new uranium recovery operations and several companies conducting final reclamation/restoration operations. The Wyoming Mining Association (WMA) has reviewed the draft regulatory guide and has the following comments:

#### **General Comments**

The Association agrees with the concept of redefining the Total Effective Dose Equivalent (TEDE) such that:

$$\text{TEDE} = \text{EDEX} + \text{CEDE}$$

The use of EDEX (Effective Dose Equivalent for External Exposure) is preferable in the case of non-uniform radiation fields. While non-uniform radiation fields are generally not encountered in uranium recovery operations, they could be in cases where nuclear density gauges are used within a mill to measure slurry densities in pipes or in cases involving the use of downhole logging sources or neutron generators. Thus, the WMA supports this change.

#### **Occupational Dose Monitoring at Levels Sufficient to Demonstrate Compliance**

When discussing occupational dose monitoring requirements, the current version of Regulatory Guide 8.34, Regulatory Position C1.1 states:

*"The potential for unlikely exposures and accident conditions need not be considered because these events, by definition, are unlikely".*

The draft revision in Regulatory Position C.2.c (*Occupational Dose Monitoring at Levels Sufficient to Demonstrate Compliance*) does not include a similar statement. Staff should clarify whether this condition still applies to forecasting occupational dose to determine the need for monitoring or whether

a licensee must now postulate credible unlikely and accident scenarios and estimate the related occupational dose. The WMA requests that the language above from the original regulatory guide be added to the revised one.

### **Engineering Controls and Respiratory Protection**

Regulatory Position C.2.e (pg. 9) states that licensees:

*"...may take credit for the use of ... respiratory protection when determining the need for internal dose monitoring".*

For clarity it should be stated that this allowance only applies to respiratory protection used in accordance with a respiratory protection program that meets the requirements of 10 CFR §20.1703. The WMA requests this change.

### **Recording and Reporting of Monitoring Results**

This section states:

*The results of monitoring when voluntarily provided, but not required by 10 CFR 20.1502, are not subject to the dose recording or reporting requirements in 10 CFR Part 20, Subpart L, "Records" or Subpart M, "Reporting." However, licensees may voluntarily provide these reports to the exposed individual(s) and to the NRC. The results of the voluntary monitoring also may be used in a prospective assessment to determine the need for future monitoring.*

The WMA supports this language since it clarifies issues regarding voluntary monitoring. Most uranium recovery licensees have external doses that are below ten (10) percent of the limits in § 20.1201(a) and are not required to perform monitoring for external dose; however they do so anyway to document the low external doses received by their workers. As such this language is useful.

The Wyoming Mining Association (WMA) appreciates the opportunity to comment on this draft regulatory guide. If you have any questions please do not hesitate to contact me.

Sincerely,  
WYOMING MINING ASSOCIATION



Marion Loomis  
Executive Director

Cc: Katie Sweeney – National Mining Association (NMA)