

June 15, 2015

MEMORANDUM TO: Marissa Bailey, Director
Division of Fuel Cycle Safety, Safeguards,
and Environmental Review
Office of Nuclear Material Safety
and Safeguards

THRU: Craig Erlanger, Deputy Director **/RA/** - for
Division of Fuel Cycle Safety, Safeguards,
and Environmental Review
Office of Nuclear Material Safety
and Safeguards

FROM: Robert Johnson, Branch Chief **/RA/**
Fuel Manufacturing Branch
Division of Fuel Cycle Safety, Safeguards,
and Environmental Review
Office of Nuclear Material Safety
and Safeguards

SUBJECT: INTERIM STAFF GUIDANCE ON ACUTE URANIUM EXPOSURE
STANDARD FOR WORKERS

The draft interim staff guidance (ISG) on acute uranium intake was issued for public comment in the *Federal Register* on September 17, 2014. The ISG is based on the staff's independent review of the uranium toxicity information. The staff conservatively identified acute uranium intake quantities that would produce consequences similar to the high and intermediate consequence effects identified in Title 10 of the *Code of Federal Regulations* (10 CFR) Section 70.61.

The Nuclear Energy Institute (NEI) submitted comments on November 12, 2014. The NEI letter supported the ISG, recommended its issuance in final form at the earliest opportunity and offered a few specific comments for clarification, which the staff addressed. A second commenter stated the ISG looked like a good idea but had no specific comments on the details of the ISG.

During an informal discussion between industry and U.S. Nuclear Regulatory Commission staff at the Atlanta Facility Operations Committee (FOC) meeting on March 4-5 2015, an industry official suggested that the acceptable acute uranium exposure standards presented in the ISG might be in conflict with the existing

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regulations. This point was not raised in the NEI comments on the draft ISG. The staff identified two sections of the 10 CFR Part 70 regulations that discuss uranium intake limits, but they are not considered to be in conflict with the information in the ISG.

The disposition of the formal comments received during the comment period as well as the review of the informal comments made at the Atlanta FOC are discussed in a memorandum to Robert Johnson, (ML15147A683).

The draft ISG and comments from NEI have been reviewed by ACRS, who then declined review of the draft final version.

We recommend that the Division of Fuel Cycle Safety, Safeguards, and Environmental Review finalize and issue the ISG which identifies acceptable acute uranium exposure standards for use in ISAs prepared under the requirements of Part 70, subpart H.

Enclosure:

FCSE Interim Staff Guidance ISG-14,
Revision 0 Acute Uranium Exposure
Standards of Workers

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