

Gallagher, Carol

RULES AND DIRECTIVES
BRANCH
JUN 23 2015

Subject:

FW: OAS Comments on NUREG-2126

Attachments:

STC-15-003 NUREG 2126 OAS Comments.pdf

2015 JUN 23 AM 9:28

From: Welling, Mike (VDH) [mailto:Mike.Welling@vdh.virginia.gov]

Sent: Friday, March 13, 2015 1:32 PM

To: Mandeville, Douglas

Cc: OAS Executive Board; Einberg, Christian; Rusty Lundberg; Charles Maguire

Subject: OAS Comments on NUREG-2126

RECEIVED

Attached are the OAS Board comments.

Michael Welling
Director Radioactive Materials Program
Virginia Dept of Health
109 Governor St, 7th Floor
Richmond, VA 23219
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12/18/2014
79 FR 75597

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<http://www.vdh.virginia.gov/Epidemiology/RadiologicalHealth/>

SUNSI Review Complete

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Add= J.T. Mandeville (dtms)



Michael Welling, Chair, Virginia
Sherrie Flaherty, Chair-Elect, Minnesota
Alan Jacobson, Past-Chair, Maryland
Debra Shults, Treasurer, Tennessee
Megan Shober, Secretary, Wisconsin
Michael Ortiz, Director, New Mexico
Jennifer Opila, Director, Colorado

March 13, 2015

Doug Mandeville
Office of Nuclear Material Safety and Safeguards
U. S. Nuclear Regulatory Commission
Washington, DC 20555

RE: Request for Comments on the NUREG 2126 Standard Review Plan for Conventional Uranium Mills and Heap Leach Facilities (STC-15-003)

Dear Mr. Mandeville,
The Organization of Agreement States (OAS) Executive Board (Board) has reviewed the above document and respectfully submits the following comments for consideration by the NRC.

1. Sec. 2.2 Historical Investigations:

This NUREG should provide some guidance on reviewing the archaeology aspects of the site and guidance on applicability and implication of Section 106 of the National Historic Preservation Act.

2. Sec. 3.3 Design of Surface Impoundment and 3.5 Waste Management:

EPA is proposing a new rule for 40 CFR 61 Subpart W for uranium impoundments. This NUREG should provide guidance on how to review the impoundment design and operation in compliance with the new NESHAPs rule.

3. Sec. 4.4 Qualifications for Personnel Conducting the Radiation Safety Program:

The staff also needs to review the qualification and training plan for personnel conducting the environmental monitoring and sampling program for all applicable media. Therefore, this NUREG should provide some guidance on this topic.

4. Sec. 4.5 Radiation Safety Training:

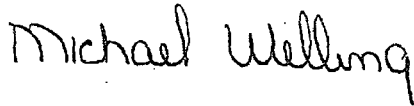
The applicant needs to establish a radiation safety training program for contractors and visitors, in addition to employees. Therefore, the staff needs to review this element of the training program.

Alabama, Arizona, Arkansas, California, Colorado, Florida, Georgia, Illinois, Iowa, Kansas, Kentucky, Louisiana, Maine, Maryland, Massachusetts, Minnesota, Mississippi, Nebraska, Nevada, New Hampshire, New Jersey, New Mexico, New York, North Carolina, North Dakota, Ohio, Oklahoma, Oregon, Pennsylvania, Rhode Island, South Carolina, Tennessee, Texas, Utah, Virginia, Washington, Wisconsin

5. The staff should review applicant's proposed methods and calculation for compliance with the public dose limits based on the proposed facility design and uranium recovery processes. Therefore, this NUREG should include some guidance on this topic

We appreciate the chance to comment on this subject, and stand ready to answer any questions you may have.

Sincerely,

A handwritten signature in black ink that reads "Michael Welling". The signature is written in a cursive, slightly slanted style.

Michael Welling
OAS Chair
Director Radioactive Materials Program
Virginia Dept of Health
109 Governor St, 7th Floor
Richmond, VA 23219