

RulemakingComments Resource

From: Khayyat, Adnan <Adnan.Khayyat@illinois.gov>
Sent: Friday, July 24, 2015 11:20 AM
To: RulemakingComments Resource
Subject: [External_Sender] Docket ID NRC-2011-0012
Attachments: IEMA's Comments RE Docket ID NRC-2011-0012.pdf

Please find attached IEMA's comments RE Docket ID NRC-2011-0012.

Thanks for the opportunity to comment,
Adnan

Adnan G. Khayyat
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July 24, 2015

Secretary
US Nuclear Regulatory Commission
Washington, DC 20555-0001

Attn: Rulemakings and Adjudications Staff

Attached are the Illinois Emergency Management Agency (IEMA) comments on the proposed revisions to 10 CFR Part 61 (Docket NRC-2011-0012). IEMA thanks the Commission for the opportunity to comment on the proposed regulatory revision.

Any questions pertaining to the attached comments may be directed to Kelly Grahn at Kelly.Grahn@illinois.gov or 630-293-8242.

Sincerely,



Adnan Khayyat, Chief
Bureau of Radiation Safety

Attachment



Comments from the Illinois Emergency Management Agency on
March 2015 Proposed Rule
Low-Level Radioactive Waste Disposal (10 CFR Part 61)
[NRC-2011-0012]

The Illinois Emergency Management Agency (IEMA) thanks the US Nuclear Regulatory Commission (NRC) for the opportunity to review the proposed revisions to Part 61. IEMA offers the following general and specific comments for the NRC's consideration

General Comment

As a State with a closed LLRW facility, we want to ensure that this facility is “grandfathered” and that any proposed changes in the Part 61 revision do not result in *any* increased costs with our ongoing monitoring effort for this facility or place any undue burden onto the state.

Specific Comments

In § 61.13

The analyses identified in this section become more uncertain the longer the compliance period. Guidance would be required to assist the applicant and regulator in defining the range of performance variables for natural and engineered features of the disposal facility and the range of degrading mechanisms and disruptive processes. Please ensure that this guidance is provided in the associated guidance document for this Rule.

9. In § 61.41

The ALARA objective for the performance period analysis is subject to debate as to what is a reasonable release. IEMA agrees that a fixed dose limit is not appropriate. However, specific guidance is warranted to assist the applicant and regulator as to what should be seen as reasonable. Please ensure that this guidance is provided in the associated guidance document for this Rule.

10. In § 61.42

The addition of the 5 milliSieverts (500 millirems) standard for the inadvertent intruder dose during the compliance period eliminates the uncertainty for the applicant and regulator. Specific guidance is warranted to assist the applicant and regulator as to what should be seen as a reasonable intruder dose during the performance period. Please ensure that this guidance is provided in the associated guidance document for this Rule.