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Instructions for Recording and Reporting Occupational Radiation Dose Data

Comment On: NRC-2017-0205-0001

Guidance: Instructions for Recording and Reporting Occupational Radiation Dose Data

Document: NRC-2017-0205-DRAFT-0002

Comment on FR Doc # N/A

Submitter Information

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82FR 48125

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General Comment

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See attached file(s), URENCO USA Comments on draft RG 8.7. NRC Docket 2017-0205

Attachments

UUSA Comments on DG-8056 NRC_2017_0205

SUNSI Review Complete

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Add= T. Brock (HAB2)

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12/13/2017

Subject: UUSA Comments on Draft Regulatory Guide DG-8056, "Instructions for Recording and Reporting Occupational Radiation Dose Data" issued October 16, 2017 (Docket No. ID NRC-2017-0205)

On October 16, 2017, the Nuclear Regulatory Commission (NRC or Commission) published a Federal Register Notice, 82 *Fed. Reg.* 48125, dated October 16, 2017 (Notice), requesting public comment on the draft regulatory analysis DG-8056, "Instructions for Recording and Reporting Occupational Radiation Dose Data", prepared as part of its proposal to revise Regulatory Guide(RG) 8.7. UUSA hereby submits and requests the Commission's consideration of the following comments.

Section 1.1 If Monitoring Is Not Required

If the prospective dose evaluation shows that an individual is not likely to receive a dose in a year that exceeds the monitoring criteria set forth in 10 CFR 20.1502, the licensee is not required to monitor the individual's dose, to keep records, or report the individual's dose. If monitoring of the occupational intake of radioactive material and assessment of the CEDE is not being performed, then licensee evaluations of subsequent minor intakes that were anticipated based on the prospective dose evaluation or pre-job evaluations is not required monitoring. However, dose assessments performed to quantify unanticipated intakes or exposures are considered required monitoring, regardless of the magnitude of the resulting doses, and results must [be] recorded and reported accordingly.

Regarding the statement above, "However, dose assessments performed to quantify unanticipated intakes or exposures are considered required monitoring, regardless of the magnitude of the resulting doses, and results must recorded and reported accordingly," UUSA believes that minor doses should not be included up to a total of 10 mrem per year.

Our concern with the issue is on the definition of "unanticipated intakes". UUSA's protocol would include writing a dose evaluation for any urinalysis results $>0.27\text{mg/L}$, which equates to 0.50 mrem committed effective dose equivalent (CEDE). The conservatism from the draft RG lies in events where there would only be a fraction of a mrem, for instance 0.03 mrem CEDE. The RG states unanticipated intakes that are found during a routine bioassay would be recorded (recorded in this case as 0.03 mrem) and reported. UUSA finds it unreasonable to record and report an intake of less than 10 mrem.

UUSA appreciates the opportunity to comment on the subject Regulatory Guide. If you have any questions, please contact Wyatt Padgett, Licensing and Performance Assessment Manager, at 575-394-5257.

Respectfully,



Stephen R. Cowne
Chief Nuclear Officer and Head of Compliance