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General Comment

Section 7.1.2 discusses offsite disposal; the dose assessment criteria is stated as 5 mrem/yr with some exceptions. My experience is that at the RCRA-c facilities currently accepting radioactive wastes the workers are trained as radiation workers, monitored for exposure using 29 CFR 1910.1096 standards. They also use 10 CFR as a reference to set up their radiation protection programs. As such they are the equivalent of a licensee's rad workers. Given this should they could be considered as radiation workers and their dose should not be limited to 5 mrem/year. Workers such as internal facility transporters such as truck drivers transporting wastes from a rail transfer facility to the landfill may be sub contract personnel and not monitored thus their dose could be limited to the 5 mrem/yr. Accordingly it is likely that these truckers may be exposed to multiple alternate disposals so limiting their dose to 5 mrem/yr seems prudent. The basement intruder scenario should also be excluded from consideration when a facility has covenants or permit conditions restricting future use of the property in perpetuity such as a TSCA permit which prohibits future residential lands use forever.

SUNSI Review Complete

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