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 Guidance Document for Alternative Disposal Requests

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General Comment

Section 7.2. appears to present separate and different dose limits for 40.13a and 20.2202 requests. Recommend one standard be adopted for ease of understanding and implementation. Additionally, one standard will be easier to communicate to stakeholders such as public groups around disposal facilities. The 20.2002 limit is very conservative under the disposal alternative. Use of the stated 40.13a dose limit of 25 mrem/yr is appropriate with possibly a secondary limit of the public dose limit (100 mrem/yr). This is evident given that the RCRA-C facilities' primary business is other (non radioactive) wastes, thus the typical worker's exposure to radioactive wastes is only a small portion of the work year. The 25 mrem/yr limit therefore will protect most workers. My experience is a critical worker or maybe 2 critical workers at each facility can be identified and the dose assessment can focus on the exposure to these workers. These critical receptors could be subject to increased reporting requirements to NRC to determine if they are likely to be exposed to multiple radioactive disposals requests in one year. Alternatively, since most workers at the disposal sites discussed in the guidance are subject to dosimetry, NRC may want to rely on the actual measured exposures from past years of disposals under a waste acceptance criteria, rather than rely on assumptions of multiple exposures to reduce the exposure limit. In other words if the measured dose to a critical worker for disposal of 40.13a material is consistently well less

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than the 25 mrem/yr limit then concerns for multiple exposures in a year may not be warranted thus a 25 mrem/yr dose limit may be sufficiently conservative.