

NOTATION VOTE

RESPONSE SHEET

RELEASED TO THE PDR

12/7/92

date

initials

TO: SAMUEL J. CHILK, SECRETARY OF THE COMMISSION
FROM: COMMISSIONER REMICK
SUBJECT: SECY-92-238 - FINAL TECHNICAL POSITION ON
ALTERNATE CONCENTRATION LIMITS FOR TITLE II
URANIUM MILLS

APPROVED Ximport DISAPPROVED Ximport ABSTAIN _____

NOT PARTICIPATING _____ REQUEST DISCUSSION _____

COMMENTS:

See attached comments.

5212110198 920904
PDR COMMS NRCC
CORRESPONDENCE PDR

Ferrat J. Remick 151

SIGNATURE *by telephone 9-4-92*

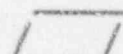
RELEASE VOTE



Sept. 4, 1992

DATE

WITHHOLD VOTE



ENTERED ON "AS" YES ☒ No _____

*JFDR
11/1*

Commissioner Remick's Comments on SECY-92-238

I approve the publication of Enclosure 1 to SECY-92-238 as a staff technical position on the methodology for the licensee to prepare and the NRC staff to review Alternate Concentration Limit (ACL) applications for Title II Uranium Mills subject to incorporation of the following comments.

On page 27 of the proposed staff technical position, the statement is made that "Generally, a lifetime risk level of 1×10^{-6} is utilized; however, an alternate risk level in the range of 1×10^{-6} to 1×10^{-4} may be utilized...."

I am not persuaded that Title II uranium mills have to be reduced to this level of risk to be found acceptable from a public health and safety standpoint. Based on a risk coefficient of 5×10^{-4} per person-rem, the lifetime risk level of 1×10^{-6} set forth in the staff's technical position would be equivalent to about 0.02 mrem per year. Such a standard is inconsistent with other safety standards established by the NRC in 10 CFR.

I believe that an annual individual risk level on the order of 10^{-5} to 10^{-6} per year (i.e., lifetime risk level of approximately 10^{-3} to 10^{-4}) would be an appropriate level for Title II uranium mills. Therefore, I propose that the risk levels set forth on page 27 of the staff's technical position be deleted and that ACLs be calculated so as to be consistent with doses to the public that are acceptable under 10 CFR Part 20 or Part 61.