



PR-Misc Notice
(Reg. guide)

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July 11, 1985

CE 309-4

Div. 3

Secretary of the Commission
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

ATTN: Docketing and Service Branch

Dear Sir:

Thank you for the opportunity to comment on the draft regulatory guide entitled "General Guidance for Designing, Testing, Operating, and Maintaining Emission Control Devices at Uranium Mills." Staff of the Bureau of Radiation Control have reviewed the document and offer the following comments for consideration:

- 1) Although consistent operation of emission control devices at near peak efficiency is sought at uranium mills, calculations for environmental impact assessments should be based on an average value. This average value of efficiency would consider any gradual efficiency reduction during normal operation until a scheduled maintenance is conducted to restore it back to the peak or near peak level again.
- 2) In addressing emission control devices, the applicant/licensee should consider backup or redundant systems.
- 3) In the discussion of bag or fabric filter material selection, the temperature range of operation should be considered in choosing a suitable fabric. The effects of particulate material buildup in bag or fabric filters on filtering efficiency should also be addressed in more detail.
- 4) For the sake of completeness, it is recommended that uranium tailings impoundments be mentioned in Section B as a possible source of airborne

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Acknowledged by date JUL 16 1985 pd

Secretary of the Commission

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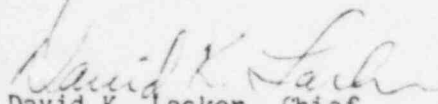
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contamination. The guide should suggest adequate design measures (e.g., wind screens, if necessary) or refer the applicant/licensee to an appropriate regulatory guide for that information.

- 5) In the discussion of the inspection program in Section B, we recommend an addition that inspections should be performed whenever a change in the characteristics of the feed material has occurred, e.g., switching the source of the ore or altering the mix of ores fed to the plant. Also, any such operational changes may warrant a readjustment of the operating parameters of the emission control systems.
- 6) In the regulatory position on design and operation in Section C, the draft states that system drawings should be available to identify the location of valves and instruments. It may be added here that a similar complete record should be kept of any changes in the emission control system as constructed that may be different from the original design, and any subsequent modifications that may have been made by the licensee in order to improve performance efficiency.
- 7) The integrity of the ducting or piping which carries the gases to and from the filters should be addressed.
- 8) It is good that Appendix A (maintenance activities) begins with visual inspection of the devices. One should not become too dependent on monitoring instruments which may be located at some distance from the filtering device and may fail.

If you have any questions regarding these comments, please contact us.

Yours truly,



David K. Lacker, Chief
Bureau of Radiation Control

cc: Mr. Donald A. Nussbaumer
Office of State Programs