



Mississippi State Department of Health

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DOCKET NUMBER
PROPOSED RULE PR-140 (8)
(50 FR 13978)

Alton B. Cobb, M.D., M.P.H.
State Health Officer

July 29, 1985

DOCKETED
USNRC

'85 AUG -1 A10:30

U.S. Nuclear Regulatory Commission
Secretary of the Commission
Washington, D.C. 20555
Attention: Docketing & Service Branch

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

Gentlemen:

RE: FEDERAL REGISTER/VOL. 50, NO.68/TUESDAY, APRIL 9,
1985/PROPOSED RULES

We are pleased to submit these comments concerning the referenced proposed revisions to 10 CFR Part 140:

(1) Any of the three options is an improvement over the existing regulation.

(2) We favor option #3 to the others presented because it is more simplified, straightforward and easily implementable.

(3) As a suggested improvement, NRC may wish to consider addition of another item to option #3 which addresses the remote case of a sufficient quantity of spent fuel being atomized as particulate in an explosion to create a lung burden of long-lived transuranics in the affected population; but, which may not produce the contamination levels required by item (c) of option #3 and may not deliver the 10 rads per 24 hour period called for in item (b).

We recognize the highly unlikely probability of such an event, especially in view of recent reports reflecting the difficulty of atomization of transuranics (NUREG/CR-2472 and SAND 82-2365). Nevertheless, it would be conservative to consider this scenario, for which we propose the following addition:

(d) Evidence that at least one person has received a body burden of radionuclides which will result in a calculated 70 year dose commitment of at least 50 rem.

We are concerned that under certain meteorological conditions, the deposition rate may be very low, yet substantial exposure to airborne particulates may occur over the applicable time interval.

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Acknowledged by card. AUG - 1 1985 *pa*

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Dave
aau: H.T. Peterson, 113055*

Admittedly, the "have received" is a deviation from the "may receive" format of option #3. However, it protects members of the public who can be shown by whole body counter methods to have definitely received an appreciable dose commitment.

Sincerely,

A handwritten signature in cursive script, reading "Eddie S. Fuente".

Eddie S. Fuente, Director
Division of Radiological Health

ESF:wg

cc: Mr. Ron Forsythe, MDE&T