

A. N. SHINPOCH  
Secretary



DOCKET NUMBER

PROPOSED RULE

PR-Misc Notice  
(Reg Guide)

STATE OF WASHINGTON

DEPARTMENT OF SOCIAL AND HEALTH SERVICES

Olympia, Washington 98504-0095

DOCKETING  
USARC

'85 DEC -2 P1:15

November 26, 1985

DOCKETING & SERVICE  
BRANCH

ES 401-4  
DIVISION 3

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

Dear Commission Secretary:

We have reviewed the Draft Regulatory Guide and Value/Impact Statement concerning "On Site Meteorological Measurement Program for Uranium Recovery Facilities - Data Acquisition and Reporting." The following comments are forwarded for your consideration.

It appears that this type of a system at a uranium mill would be most valuable if a computer model such as MILDOS or MILDOSM was used to assess the potential environmental impact. Therefore, perhaps the proposed regulatory guide should recommend that the data be compiled in a format consistent for data input into similar models.

The proposed guide outlines meteorological equipment requirements for new uranium mills and those applying for license renewal. Granted, the proposed guide is only a guide and specific site requirements would probably change from one location to another. Likewise, appropriate exemptions to the proposed guide requirements would probably be allowed at specific locations due to varying local circumstances such as weather, topography and operational history.

Certain exemptions would probably be considered for mills that have shutdown due to economic reasons or bankruptcy. Mills closed due to financial problems may have only two daytime people on-site performing minimum maintenance and monitoring duties. In some cases, personnel at a shutdown mill are on site only five days a week leaving equipment unattended two days a week and during the night time hours. Also, exemptions to some of the recommended meteorological measuring devices should be considered for a remotely located mill. A remote mill location with a very low population density (less than 50) in a five mile radius could possibly be totally exempt from the guide's recommendations.

Currently, since all uranium mills are shutdown, or perhaps will be by the time the guide is finalized, will there be much application for the guide without many exemptions? Also, it appears that the recommendations of the proposed guide may be somewhat elaborate for a shutdown mill trying in every way to economize.

8512050084 851126  
PDR REGGD  
03. XXX C PDR

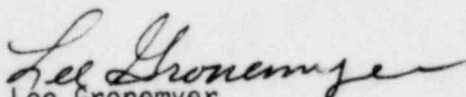
D209 add: Ed Hill, 113055  
1/6

Secretary of the Commission  
Page Two

Other than my concerns expressed above, meteorological equipment installations at a mill conforming to the guide's recommendations would definitely augment radiation dose assessment and in the development of better radiological practices.

We appreciate this opportunity to comment on the proposed guide.

Sincerely,

  
Lee Gronemyer  
Uranium Mills Program

LG:sm