



DOCKET NUMBER

PROPOSED RULE

PR-Misc Notice
(Reg Guide)

DOCKETED

UNIT

Texas Department of Health

Robert Bernstein, M.D., F.A.C.P.
Commissioner1100 West 49th Street
Austin, Texas 78756-3189
(512) 458-7111Radiation Control
(512) 835-7000OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCHRobert A. MacLean, M.D.
Deputy Commissioner
Professional ServicesHermas L. Miller
Deputy Commissioner
Management and Administration

November 27, 1985

ES 401-4
Division 3Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, DC 20555

ATTN: Docketing and Service Branch

Dear Sir:

Thank you for the opportunity to comment on the draft regulatory guide entitled "Onsite Meteorological Measurement Program for Uranium Recovery Facilities - Data Acquisition and Reporting." Staff of the Bureau of Radiation Control have reviewed the document and offer the following comments for consideration:

- 1) The document provides adequate guidance for onsite meteorological modeling at uranium recovery facilities. However, the type of site-specific information described is not necessary for making assessments at in-situ uranium facilities. Worst case modeling from past local meteorological history has shown very little risk to uranium workers and the general public for in-situ facilities.
- 2) An important criteria for an operational meteorological monitoring program is data validation. To assure the accuracy of predictive modeling, measured radionuclide values at selected locations are compared to predicted values. An acceptable level of agreement is then used to validate the computed population doses. In cases where large discrepancies occur, accurate meteorological data is essential to confirm conditions during the sampling period. The addition of a discussion of data validation would be useful in the guide.

DS09

add Ed Hill, 113055

B512100258 851127
PDR REGCD
03. XXX C

PDR

Acknowledged by card.....
DEC 09 1985

Secretary of the Commission

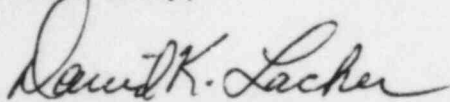
Page 2

November 27, 1985

- 3) Pre-operational meteorological data must be representative of the site and must characterize as much as possible the yearly (average) conditions which will occur during the multi-year lifetime of the plant. To this end, long-term data from nearby weather services should be compared to that from the pre-operational period to establish the relative normalcy of the collected data. These items should also be addressed in the document.

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

Yours truly,



David K. Lackner, Chief
Bureau of Radiation Control

cc: Donald A. Nussbaumer
Office of State Programs