

SCHOOL OF NUCLEAR ENGINEERING

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Reg. Guide

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



Dear Sir:

I have just completed a careful review of Regulatory Guide 8.24, Health Physics Surveys During Enriched Uranium-235 Processing and Fuel Fabrication. In general I found the guide well done and completely acceptable for use in the profession. However, I would like to comment on one portion of the guide.

Table 1, Survey Frequencies, seems to be overly restrictive in its survey requirements for lunch rooms, etc., in terms of removable surface contamination surveys. I fully realize that this area presents a potential for an internal exposure to an alpha-emitting radionuclide.

Nevertheless, I feel the requirement for daily surveys of eating areas is overly restrictive, unrealistic, and probably impractical.

It seems that, with continuous air sampling underway in controlled areas in the facility, any release which might reach eating areas should be detected before it occurs. Thus, a weekly survey should suffice.

If the source of contamination in eating areas is due to transfer by contaminated work clothes, this can be controlled by tightening the restrictions given in Table 2 in the guide. In either case, no matter what the source of the potential contamination in the eating area, it seems more sensible to control within the controlled area rather than using surveys in eating areas to indicate problems which exist elsewhere in the facility.

I appreciate the opportunity to comment on this guide. If there is need for further discussion of my comments, please let me know.

Sincerely,

*John W. Poston*  
John W. Poston  
Associate Professor

JWP/meb

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Acknowledged by card. 12/13.....

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