

SUNI Review

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Measuring, Evaluating, and Reporting Radioactive Material in Liquid and Gaseous Effluents and Solid Waste Licenses Under 10 CFR Part 50, Part 52 and Part 72

Comment On: NRC-2020-0278-0001

Measuring, Evaluating, and Reporting Radioactive Material in Liquid and Gaseous Effluents and Solid Waste

Document: NRC-2020-0278-DRAFT-0003

Comment on FR Doc # 2020-29154

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General Comment

See attached file(s)

Attachments

Comments on Draft RG 1_21

Comments on Draft Regulatory Guide DG-1377 (proposed rev 3 to Reg Guide 1.21)

Consider adding the following to Related Guidance section:

RG 1.184 for decommissioning. Section 8 (3rd paragraph) implies that continued use of Appendix I is discretionary, which may conflict with some of the language in the draft RG 1.21.

NUREG-0133, as it has staff positions on methodologies for estimating exposure due to release of effluents

NUREG-0543, as it describes methods for complying with total dose requirement of 40CFR190,

Comment on existing version of RG 1.21

There are references to the 10 percent of total dose criteria of Regulatory Position C in Regulatory Guide 1.109 in several places in Reg Guide 1.21. Neither RG 1.109 or RG 1.21 clarifies what the total dose reference value is. The concept is to make sure that significant exposure pathways are included in the total dose and to provide a criterion for exempting or including a pathway. If total dose, in this context, was equated to the annual dose limits of Appendix I, then 10 percent would far exceed normal operational doses, or the licensing phase Appendix I doses, as both are typically very small fractions of the ALARA dose limits taken from 10CFR50, Appendix I. Operational doses are a moving target and may get smaller over time, especially during major phases of decommissioning, however a total dose reference value could be derived from a representative operational period. It is suggested that RG 1.21 be clarified to provide guidance on using operational doses or the Licensing phase Appendix I analysis doses to derive a 10 percent reference total dose.

Additionally, it would be of value to distinguish release pathways from exposure pathways, and to note whether the 10% criteria applies to a new release pathway.