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From: Vernon J. Brechin <vbrechin@igc.org>
To: TWFN_DO.twf2_po(NRCREP)
Date: Sun, Feb 13, 2000 11:08 AM
Subject: Draft Report Comments: SR1717 - Draft - Systematic Radiological Assessment of Exemptions for Source and Byproduct Materials

(4)

Below is the result of your feedback form. It was submitted by
Vernon J. Brechin (vbrechin@igc.org) on Sunday, February 13, 2000 at 11:08:38

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02/14/00

Thank you for the opportunity to comment on the draft version of NRC Report Number: NUREG-1717 Systematic Radiological Assessment of Exemptions for Source and Byproduct Materials.

I recommend that the report contain a "Definition of Terms" section near the very beginning, perhaps following the ABSTRACT section. That section should define the two terms "Source Materials" and "Byproduct Materials." Those definitions should originate with the source statutes and the U.S. Code provisions. Standard source citations should accompany the definition of each term that is defined.

Under Title 42 of the U.S. Code two definitions of byproduct material appear that involve very different originating materials. The final NUREG-1717 report should clearly indicate, in the definition and perhaps in every other notation of the term "byproduct material," whether the referred byproduct material is that defined in 42USC2014(e)(1) or the material defined in 42USC2014(e)(2).

If there is a problem incorporating the three definitions into the report then a notation to that effect should be included in the report, perhaps as a footnote. If irregularities of the definition of the term "byproduct material" appear in other NRC related Code, agency regulations, internal directives and reports then efforts should be made to correct such irregularities.

If the definition of byproduct material, found in 42USC2014(e)(1), involves material volumes that are regarded as Restricted or otherwise classified information, then that should be clearly indicated as well in the final report. The final report should also clearly indicate if any byproduct material radiological assessments were omitted from the report due to information on that material being formally classified. If such omissions exist, the final report should cite the specific statutory provisions that resulted in the omissions.

Thank you for taking my comments into consideration.

Vernon J. Brechin