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Rules and Directives Branch
Office of Administration
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

RE: DRAFT REGULATORY GUIDE DG-8027

The following are Colorado's comments on Draft Regulatory Guide DG-8027

General Comments:

1. It is not clear that this Guide adequately addresses additional occupational practices that may be subject to occupational ALARA review subsequent to the expansion of scope for uranium recovery facilities. The scope of this Guide should be broad enough to be applicable to all uranium recovery facilities under current or potentially new regulations, e.g., the scope of 10CFR Part 41 should be considered. Licensed recovery of uranium as a secondary process at other types of mills should also be considered in the scope of the Guide. Some practices not adequately addressed are reprocessing/recovery facilities, in-situ facilities and disposal of non-1e.(2) material at Title II sites.
2. Significant changes to ALARA philosophies and programs have been implemented in the seventeen years since Reg Guide 8.31 was published. It is not apparent that recognition of these changes has been considered in this re-issue. For example, automated processes that reduce worker time in radiological areas and electronic data gathering and storage have become more prevalent in recent years. Both of these concepts are applicable for consideration in reduction of dose to workers and should be part of an occupational ALARA program.

Template - ADM-013

E-RID5 = ADM-03
Add = Ann Beronik
(FFB)

Specific Comments:

1. Page 6, 2.3.1. Daily and Weekly Inspections, sentence 4.

Consider encouragement of a database of the inspection logs to allow for better review of information gathered over the year(s).

2. Page 9, 2.5 Radiation Safety Training. List of topics.

Consider a reference to industrial hygiene training of recognition of hazards from non-radiological components of uranium recovery (hazardous substances). Lessons learned from the occupational exposure to workers at DOE gaseous diffusion plants should be applied in uranium recovery facilities.

3. Page 10, 2.5 Radiation Safety Training, 2nd Paragraph, sentence 2.

Please consider emphasizing that the training should be commensurate with the risks and hazards of the tasks.

4. Page 12. 3.5 Laboratory Design Features. Sentence 4.

Please re-consider this requirement to be as close to background as practicable., with an upper limit of the cited value. Further, the maximum removal contamination level should be 20 dmp/100 cm².

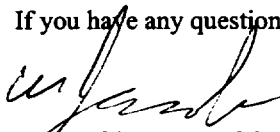
5. Page 13. Ore and Product Storage. List item 1.

Consider a requirement that stockpiles of ore (under the new definition) be containerized if it is stored outdoors and is susceptible to dispersion by the elements. With the advent of reprocessing and alternative disposal practices at mill sites, the potential for miss-handling of material increases while accumulating enough material to run through the mill.

6. Page 15, 4.4 Miscellaneous Locations.

This would be an appropriate location to discuss ISL facilities.

If you have any questions, please contact me at (303) 692-3036, or Phil Egidi at (303) 692-3038.



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