

NOTE TO: John W. Craig
Assistant for Operations, OEDO

August 27, 2002

FROM: Farouk Eltawila, Director RA/FEltawila
Division of Systems Analysis and Regulatory Effectiveness
Office of Nuclear Regulatory Research

SUBJECT: C-NOTE-
U.S. MEMBER STATE COMMENTS ON IAEA SAFETY GUIDE ON
SCOPE DEFINING LEVELS IN COMMODITIES

Attached for the Commission's information are the proposed U.S. Member State comments on the International Atomic Energy Agency (IAEA) Draft Safety Guide, DS 161, "Radionuclide Content in Commodities Not Requiring Regulation for Purposes of Radiation Protection." These comments have been coordinated with the staff of RES, NMSS, and NRR as well as the staff of the Departments of Energy (DOE) and Labor (OSHA) and the Environmental Protection Agency (EPA) through the Recycle Subcommittee of the Interagency Steering Committee for Radiation Standards (ISCORS). They have been coordinated also with the State (Illinois) regulatory representative to the ISCORS Recycle Subcommittee.

These comments have been requested by IP for transmittal to the U.S. Mission in Vienna, Austria, and, in turn, to the IAEA. Since the IAEA has requested Member State comments by September 15, 2002, IP has requested that we submit these comments by September 3, 2002. The Green Ticket EDO Control is: G20020341.

This Draft Safety Guide encompasses clearance and concentration-based requirements for regulation of practices for all radionuclides, natural and man-made. Because clearance, control of solid materials in general, and recommendations for proceeding are subjects under consideration by the Commission, (SECY-02-0133, July 15, 2002), the Commissioners may wish to review these comments for their information before they are submitted to the IAEA. Accordingly, a briefing of the Commissioners' Technical Assistants may be an effective way to communicate these comments before the due date. We would like to meet the due date, but, if necessary, we could ask IP or IAEA for an extension, as appropriate.

It should be noted that because of the nature of some of the comments, significant changes in the Safety Report may be required for resolution of comments and subsequent publication.

cc: J.Lieberman, IP
A.Thadani, RES

Distribution: A.Thadani, RES; DSARE r/f; ~~RPERWMB~~ r/f; C. Ader

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