



Pennsylvania Department of Environmental Protection

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Bureau of Radiation Protection

717-787-2480

Chief, Rules Review and Directives Branch
Mail Stop T6-D59
U.S. Nuclear Regulatory Commission
Washington D.C. 20555-0001

8/28/02
67 FR 55280
⑦

Re: Comments on Draft NUREG 1761

Dear Sir or Madam:

Pennsylvania Department of Environmental Protection, Bureau of Radiation Protection offers the following comments on the subject document:

1. Determination of DCGLs should consider other requirements such as DOT radioactive material definition (49 CFR 173.403) if the material is going on the road and downstream facility requirements. Many recycling and disposal facilities have vehicle portal monitors and these should be considered if the facility expects the released material to go off-site.
2. Paragraph 4.3 mentions release of material during normal operations. If the material is expected to be routinely released, then a discussion of the frequency of re-evaluation of DCGLs should be included in the report.
3. Provide basis for the need for machines that "automatically document the survey results" for the scan survey in paragraph 5.2.3.1. It appears that any documentation that meets requirements of 10 CFR 20.2103 would meet release survey requirements.
4. Discussion of portal monitors in paragraph 5.4.3 should be expanded to include the mention of these monitors in downstream facilities (e.g., landfills, solid waste recycling facilities).
5. Section 4.6.2.1, line # 1508 states "where d' = detectability index (the value can be obtained for Table 6.5 in the MARSSIM)," This term, d', is not called detectability index in the MARSSIM, it is called "index of sensitivity." The terms should match MARSSIM and should be listed in the glossary.
6. Section 6.1, line #2980 uses the term DCGL_w. This should be DCGL_o.

template = ADM-013

E-RIDS = ADM-03
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7. Section 6.2.2.1, line #'s 3072 and 3077 state incorrect values for the average and difference (i.e., 8.88 should be 8.89 and 0.43 should be 0.44).
8. Section 6.2.4, line # 3264 states "Examples of assumptions and possible methods for their assessment are summarized in Table 6.1." The title for Table 6.1 is "Issues and assumptions underlying survey results." The table lists only survey type and issues. There appears to be a mismatch, as the table does not address assumptions.
9. Section 6.3.2, line # 3347 refers to table 12.3. It should refer to table 6.3.
10. Appendix B, line #'s 4647 and 4648 contain incorrect conversions from m/hr to ft/hr.
11. Line numbers do not match between the 'hard copy' and the PDF file versions of the document (e.g., the information on line #'s 4647 and 4648, in comment # 10, above is contained in line #'s 4638 and 4639 in the PDF version).

If you need additional information or clarification on any of these comments, please contact Jeff Whitehead of my staff at 717-787-2964 or e-mail him at jewhitehea@state.pa.us.

Sincerely,



Richard Janati
Acting Director
Bureau of Radiation Protection

cc: R. Maiers, PE
B. Werner
J. Whitehead