



CONNECTICUT YANKEE ATOMIC POWER COMPANY

HADDAM NECK PLANT

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CY-02-137

Chief, Rules, Review, and Directives Branch  
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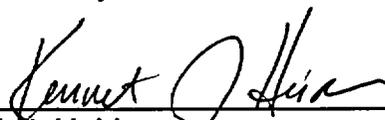
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Haddam Neck Plant and Yankee Nuclear Power Station  
Comments Regarding Draft NUREG-1761

On August 28, 2002, the NRC issued a notice in the Federal Register that Draft NUREG-1761, "Radiological Surveys for Controlling Release of Solid Materials," was available for public comment for a 90-day period. This submittal provides Connecticut Yankee Atomic Power Company (CYAPCO) and Yankee Atomic Electric Company's (YAEC) comments regarding Draft NUREG-1761 for consideration by the NRC Staff. The comments are delineated in Attachment 1. Due to the extensive nature of the comments that CYAPCO and YAEC expect the NRC to receive regarding the draft NUREG, we recommend the issuance of a second draft of the NUREG for public review and comment prior to issuance of the final NUREG.

If there are any questions regarding this submittal, please call Mr. Gerry van Noordennen at (860) 267-3938.

Sincerely,

  
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K. J. Heider  
Vice President – Operations and Decommissioning

cc: NRC Document Control Desk  
J. N. Donohew, NRC Project Manager  
J. B. Hickman, NRC Project Manager

Template = ADM-013

E-RIDS = ADM-03  
Call = J. Powers (DEP)

Attachment 1 to CY-02-137

Comments on Draft NUREG 1761: "Radiological Surveys for Controlling Release of Solid Materials," July 2002

Line Number	Comment
General	<p>This document implies that all items presented for release must be evaluated, surveyed and documented using the MARSSIM-Type methods specified. Material Release of this type is currently conducted using a "no licensee related radioactivity distinguishable from background" criteria. The current criterion is very protective of the health and safety of the public. The methods presented in this NUREG would require very complex planning, dose scenario development, dose calculations, survey methods, ALARA evaluations of release levels, statistical evaluations of survey data and extensive documentation of survey results. Considering the current release criteria, this represents an excessive burden on licensees for very little if any benefit (depending on the derived concentration guideline levels for clearance (DCGLc's) developed separately) in the form of added protection of the health and safety of the public.</p> <p>These methods could be justified for large lots of items, as presented in the examples, but should clearly not be applied to the routine releases of smaller items. For example, hand-carried items (radios, clip boards, flashlights, cameras, small tools, etc...), test equipment, handcarts, small containers, gas bottles, survey instruments, etc. Implementation of the methods prescribed in this document for these small items would be extremely costly and would likely result in a dramatic decrease in worker efficiency and an increase in the number and qualifications of HP technicians required to perform these releases with little or no benefit. As discussed above, the current criterion and release methods are sufficiently protective.</p> <p>Implementation of this document could likely require licensees to establish tools and materials dedicated to the class 1 areas of the site, typically referred to as the Radiologically Controlled Area (RCA). This would include calibration equipment, maintenance equipment and tools, office supplies, computers, and more. This would cause space problems, and require licensees to maintain two sets of nearly all equipment, one set dedicated to the RCA, the other set for areas outside the RCA. Again this is an excessive burden on licensees with little or no benefit. Licensees should be permitted to continue to utilize the current criterion and release methods.</p>

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**Comments on Draft NUREG 1761: "Radiological Surveys for Controlling Release of Solid Materials", July 2002**

Line Number	Comment
	<p>For those items released from non-RCA areas, minimal radiological controls are currently applied regarding the release of materials. Using the same philosophy with the guidance in this document, the implication is that these materials would be classified as non-impacted. Therefore, they would not require any survey.</p> <p>This document does not address the release of non-contaminated refuse. For many licensees, this material is checked using a vehicle monitor or a hand-held scintillation detector. The purpose of this check is to assure that no detectable activity is present using this technique or that no alarm will occur for the material entering a receiving station. This document implies that the survey needs to be a dose-based or an activity-based DCGL survey. In the case of refuse, this may not be appropriate.</p> <p>This document does not appear to allow the establishment of general survey protocols and release limits for like materials with similar use histories. It appears to require the development of a survey plan and criteria for each batch of items. Many portions of the survey plan development such as the data quality objectives (DQOs) are repetitive and this document should allow these to be established generically if appropriate.</p>
661-663	<p>The release criterion of "zero contamination," discussed here as under consideration, should address the survey equipment to be used for such a survey and the added cost versus increase protection of the public when different types of survey equipment are used.</p>
759-763	<p>This section appears to require the performance of an ALARA evaluation for each batch or item if not part of a batch. This would be an excessive burden on the licensee. It would seem that the ALARA evaluation could be done as part of the DCGLc development that will precede the use of the subject NUREG. The DCGLc development would use defined disposition scenarios and show generically that the DCGLc's set are ALARA. This NUREG should discuss the results needed from the separately developed clearance DCGL's.</p>

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**Comments on Draft NUREG 1761: "Radiological Surveys for Controlling Release of Solid Materials", July 2002**

Line Number	Comment
999 – 1000	This example assumes that rebar is removed from crushed concrete and that the concrete is spread to a thickness of 15 cm. Explain the basis of these assumptions and the consequences of not meeting these conditions.
1087-1094	This paragraph implies that process knowledge for items during operation is better known as compared to decommissioning. This has no relevance to a specific item and may not be true. Thus, it is a misleading statement.
1121-1124	This section discusses "non-impacted" materials but not the survey requirements for these types of items. These items require no survey as long as their "not impacted" status is justified. This guidance should state this.
1175-1186	This document should also allow the use of characterization sample results developed per 10 CFR 61 for radioactive waste shipments as characterization data for items to be free released from the areas where the 10 CFR 61 samples were taken.
1289-1302	The determination of gross activity DCGL's should allow the elimination of radionuclides, from the gross activity DCGL calculation, that are present at levels that are less than 10 % of their DCGLc up to a cumulative elimination percentage of no more than 20 %. This is consistent with 10 CFR 20 concerning radiological surveys.
1782	This statement implies that all surveys for release must be documented on a survey map. This will be a large burden for small routine items released from licensee sites.
1802-1808	This document relies too heavily on data-logging technology especially in the case where no increase above background is identified by the technician.
Table 5.8	The frequency of calibration checks should be dependent on the type and operational history of a particular detector/instrument. For example, a simple GM frisker typically maintains good stability over time and should only require a QC check daily. Other more sophisticated instruments (i.e., Tool Monitors, ISGS) have internal checks or other assurances that the instrument functions properly such that a shiftly QC check may be unnecessary.

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Line Number	Comment
2976	Include an example of a hand-carried item (e.g., two-way radio). This will clearly show the intent of the document.