

November 26, 2002

8/28/02
69 FR 55280
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Secretary
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555-0001

Subject: Comments on Draft NUREG-1761, "Radiological Surveys for Controlling Release of Solid Material"

Dear Sir or Madam:

Southern California Edison appreciates the opportunity to comment on draft NUREG-1761, "Radiological Surveys for Controlling Release of Solid Material".

This NUREG provides a process for designing, performing, and documenting surveys of solid materials that may be made available for unrestricted release from licensed facilities. Technically, the proposed survey process mirrors NUREG-1575, "Multi-Agency Radiation Survey and Site Investigation Manual (MARSSIM)". Both provide a sound technical basis for ensuring data quality, using process knowledge, averaging concentration, and determining appropriate types of clearance surveys.

Unfortunately, however, the first need is for a viable clearance rule. Clearance is the process by which a licensee surveys equipment and materials for trace levels of radioactivity before releasing those items or materials for unrestricted use by members of the public. As such, a clearance rule should precede this NUREG and provide a scientifically based measure associated with public health and safety. Without a clearance rule, technical documents such as this add little.

Attached are additional comments. In addition, we have reviewed comments made by the Nuclear Energy Institute and endorse those comments. If you have questions, please contact Dr. Eric M. Goldin at (949) 368-7532.

Sincerely,



Attachment: As Stated

Template = ADM-013

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Additional Comments on draft NUREG-1761, "Radiological Surveys for Controlling Release of Solid Material"

1. NUREG-1761 Is Not Practical for Routine Activities

The process advanced by the draft document is not practical for monitoring the day-to-day influx and outflow of tools and equipment, vehicles, and people for unrestricted release from a facility. Given a practical clearance rule, NUREG-1761 may be useful for clearing large volumes of similar materials such as scrap metal, concrete rubble, soil, and building debris but has little value in the routine daily operations of a large facility using radioactive materials. The document should clarify that the approach is useful only for large volumes of bulk material and holds little practical value for the myriad of items routinely moved in and out of a facility.

2. Existing Survey Practices Protect Public Health and Safety

Existing survey practices detect very low levels of radioactivity. "Small article monitors" used at many facilities to monitor tools and equipment are sensitive enough to detect naturally occurring radioactive material in many items such as watches and camera lenses. Other survey practices currently in use for day-to-day monitoring of vehicles and people for unrestricted release are recognized as fully protective of the public health and safety. These measures provide assurance that the probability of any undetected licensed radioactive material is negligible. However, it is doubtful that current practices would be consistent with the process described in the draft document.

Application of NUREG-1761 methodologies to the day-to-day movement of tools, vehicles, equipment, and personnel would lead to costly delays and expense without meaningful enhancement of public health and safety. As above, the process lends itself to large volumes of bulk materials and would not provide any significant benefit for routine activities.

3. Technical Standard May Be Applicable to Bulk Material Release

NUREG-1761 provides a list of material in Section 4.2 for which this survey process is most appropriate. This list of material includes scrap metal, concrete rubble, building debris, piping, and soil. Given a reasonable clearance rule, NUREG-1761 could provide a process to ensure that a licensee would realize improved efficiency and uniformity for bulk material releases. NUREG-1761 may be applicable to this list of materials but as above, the complexity and documentation requirements do not lend themselves to the routine flow of vehicles, personnel, and equipment. The draft document advances the use of newer equipment and instruments that lend themselves to the processing of large quantities of material with repetitive geometries and predictable properties. For that reason, the document would be advantageous to decommissioning projects but probably of little value for most operating facilities.