



Department of Energy
Washington, DC 20585

VIA AIR MAIL

AUG 21 1987

Mr. Jean-Pierre Olivier
OECD/NEA
38 Boulevard Suchet
F-75016 Paris
France

Dear Mr. *Jean-Pierre* Olivier:

Enclosed are comments on IAEA-TECDOC 401, "Exemption of Radiation Sources and Practices from Regulatory Control". The comments reflect opinions from the U.S. Department of Energy and from the U.S. Environmental Protection Agency. The U.S. Nuclear Regulatory Commission plans to provide separate comments later.

Progress by IAEA on exemption levels is commendable. The report is well done; however, some additional explanations and changes in the document would help its clarity.

I hope these comments will be helpful in upgrading the document. If you would like further clarification on our comments, I will be glad to arrange contacts with the appropriate people within the United States.

Best Regards,

Carl

Carl R. Cooley
Office of Policy and Outreach
Office of Civilian Radioactive
Waste Management

Enclosure

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WM Project: WM-
PDR no
(Return to WM, 623-SS)

WM Record File: 412.2.1
LPDR no

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Washington, DC 20585

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Mr. Jozsef Hirling
IAEA
P. O. Box 100
A-1400 Vienna
Austria

Dear Mr. Hirling:

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151

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Office of Civilian Radioactive
Waste Management

Enclosure

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Record Note: Identical letters sent to Hirling and Olivier

bcc:

- J. Knight, RW-24
- J. Coleman, NE-24
- J. Smiley, NE-24
- J. Fiore, NE-23
- J. Dieckhoner, DP-14
- C. Welty, EH-231
- R. Browning, NRC
- D. Galson, NRC
- F. Galpin, EPA
- W. Holcomb, EPA

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DK:WORK2/A:TEACO40.F

*Incorporates Comments received from DP
(Dieckhoner et al) EPA, (Holcomb) and E H (Welty)*

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U.S. DEPARTMENT OF ENERGY COMMENTS ON IAEA-TECDOC-401

EXEMPTION OF RADIATION SOURCES AND PRACTICES FROM REGULATORY CONTROL

INTERIM REPORT

1. The proposed limits are very conservative and result in radioactivity concentrations that are difficult to measure reliably on a waste package basis. Perhaps somewhat less conservative assumptions could lead to radioactivity concentrations in the waste that could be applied on a package basis rather than on an entire waste stream or source of waste. It appears unreasonably restrictive to exempt only entire sources or practices. (e.g. page 16, para 33) The responsible regulatory authority should determine if partial sources or practices can be adequately characterized to allow for their exemption. There are advantages to being able to separate portions of waste from a source that is below limits rather than handle all of the source as sufficiently radioactive to require special disposal. Such segregation procedures are currently a DOE practice.
2. It is not clear if each individual practice or individual source is subject to the dose limit or whether the landfill itself becomes the source. (e.g. page 14, para 25)
3. Some confusion may arise because a time limitation basis is not specified for the criterion on collective effective dose equivalent commitment. We feel that measurements and implementation of such a collective dose will be difficult. (e.g. page 16, para 35c2)
4. A recycle reuse scenario is likely and should be considered in the generic analyses. (e.g. page 30, section 3)
5. Should the rationale be stated for selecting and considering a limited number of isotopes? (e.g. page 56, section 4.1)
6. It would be helpful to have, within the document, a glossary of terms that are important to an understanding of the statements.
7. The document does not address naturally occurring radioactivity which may need exemption under certain situations.
8. Shouldn't the intent be clarified that site specific analyses be completed? Is the intent to allow nations to use the values without a site specific analysis?

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US comments on TEADOC-401 (Cont'd)

An additional review/revision of the document should be completed before it is issued as a category other than as technical document. We recommend that IAEA issue the document as a preliminary guidance that can be evaluated after a period of implementation. This would allow for evaluation of practical examples of applications and provide insight on the guidance in general. Because the limits are very conservative, additional guidance may be desirable to help ensure that administrative controls are adequate. Some sources will be dependent upon administrative control to ascertain if they are within exemption limits?

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PDR _____

LPDR _____

Distribution:

REP MSB

Carney

TUB

Galson

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