

General Comments on PRM-40-29

1. Evaluations should be conservative, but realistic. Because your petition requests exemption for catalytic devices in both mobile and industrial activities, any evaluations should look at worst case scenarios/impacts from each design (e.g., it is expected that industrial devices may be larger and thus contain more radioactive material, while mobile devices may impact more persons). If the most conservative evaluations are expected to be extremely rare situations, please also describe the scenarios/designs and impacts related to more likely scenarios/designs.
2. Please provide specific reference to or copies of any cited reports from which any data is provided (e.g., what is the source of the test data provided in your original request).
3. Please provide quantitative results (rather than qualitative statements such as “there would be no negative impact”). As part of any results, please provide assumptions used in making the calculations.
4. Please note that if the Nuclear Regulatory Commission (NRC) concludes that the exemption from NRC regulation is appropriate, we may determine that different or additional constraints are necessary rather than those proposed in the petition request. For example, instead of or along with the proposed concentration limit, a total mass quantity limit per product could be added. This may particularly be likely if a proposed design may include a plating of thorium rather than the thorium being uniformly distributed through the product. As such, if during the development of your “petitioner’s environmental report” you determine that modification of the existing proposed exemption would provide benefit (e.g., provide greater protection of health and safety, or reduce the scope of the exemption), you may modify your original petition.