

From: Patricia Holahan *NMSS*
 To: Cheryl Trottier; E. William Brach; John Cook; Larry Camper; Robert Lewis; Robert Meck *RES*
 Date: Thu, Jul 24, 2003 2:27 PM
 Subject: Re: files from today's Thadani briefing

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Rob

The DS-161 should have no impact on the values in TS-R-1 because they are done on a different basis (using the criteria in the BSS) than the values in DS-161. I believe it was considered by the consultant's developing DS-161.

Thanks, Trish

>>> Robert Lewis 07/23/03 04:58PM >>> *NMSS = dup - release*
 Robert: Below is a comment from SFPO, as promised, on the potential impact of DS 161 on transportation.

Trish: We in SFPO would like your views and defer to you if you want to amend/delete. In the interests of time, I'm sending to everyone at the same time.

"The DS-161 values could have significant impact in the transportation area, because the radionuclide-specific exemption values in DS-161 are less than those specified in IAEA's transportation safety regulations (TS-R-1) for most radionuclides. This could lead to situations in which additional regulatory measures might be sought for shipments that are exempt from regulation under TS-R-1. It should be noted that TS-R-1 is an international consensus standard used provide uniform safety in international radioactive material commerce, and that NRC and DOT are in the process of adopting TS-R-1 provisions, including the exemption values, into domestic transportation safety regulations at the present time. The exemption values in TS-R-1 were developed after considering transportation-specific scenario dose modeling, but it is our understanding that no transportation-specific dose modeling was performed in the derivation of the DS-161 exemption values. For the reasons above, if DS-161 is published, the scope should limited so as to exclude transportation activities, and recognize TS-R-1 as the operative standard for determine exemption values for transportation activities.

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>>> Robert Meck 07/17/03 02:03PM >>> *RES*
 Dear Cheryl:

Attached are the files from this morning's briefing, as requested by Ashok.

I spoke with Robert Lewis, SFO, NMSS, who expressed significant concerns that the DS 161 concentrations could lead to unwarranted regulation in transportation. His lead staff member, John Cook won't be in until next week. We agreed that the submittal to the Steering Group will carry with it, a note that there may be more comments coming from this part of NRC.

Bob

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