

From: Cheryl Trottier ^{RES}
To: Farouk Eltawila; John Greeves; Patricia Holahan ^{MISS}
Date: Thu, Jul 31, 2003 6:53 AM
Subject: revised NRC comments on DS161

In light of the extremely negative reaction we got from Carl I have made a few revisions to the NRC comments 1,2, and 3 (and deleted reference that these are all agency comments because I do not know that to be true at this point.) As our task is to get NRC comments to DOS I don't think we should be carrying the banner of others at the risk of repeating last year's experience with Carl.

As this is due to EDO today please give me feedback ASAP so I can forward our response to Ashok to send up to EDO.

CC: Robert Meck

Title: RADIOACTIVITY IN MATERIAL NOT REQUIRING REGULATION FOR PURPOSES OF RADIATION PROTECTION

Comments by Reviewer				Resolution			
Reviewer: Page 1 of 4 Date: July 31, 2003 Country/Organization: USA/NRC							
Comment No.	Para/Line No.	Proposed New Text	Reason	Accepted	Accepted but modified as follows	Rejected	Reason for modification/rejection
1	General	As drafted DS 161 could be read to imply regulatory inflexibility for excluding exposures (i.e., deemed unamenable to regulatory control) arising from naturally occurring radionuclides. Such an interpretation would lead to exclusion of naturally occurring radionuclides from regulation on the basis of a single concentration, rather than including case-by-case consideration of whether there is a net benefit (justification) to regulate them.	Usefulness; Scope; Completeness; Quality Clarity				

2	General	This draft DS 161 changes the BSS Schedule I from dose criteria for exemption of naturally occurring radionuclides to a benchmark concentration, regardless of dose.	Usefulness; Scope; Completeness; Quality Clarity				
3	General	The adoption of clearance levels would establish the lower bound to "amenable to control" without the implication of removing the potential for higher levels being excluded. As such, clearance levels could be established on a uniform "trivial dose" basis for all radionuclides. It would be contrary to the principle of justification to have a single concentration for the exclusion of NORM.	Usefulness; Scope; Completeness; Quality Clarity				
4	General	As agreed in the past by RASSC/WASSC, IAEA should engage WHO, WTO, FAO, etc. regarding foodstuffs and water.	Usefulness; Scope; Completeness; Quality Clarity				

5	General	As discussed at RASSC/WASSC, the averaging and sampling guidance should be included in a separate Safety Report. This is currently identified in the agency Blue Book.	Usefulness; Scope; Completeness; Quality Clarity				
6	General	There is ambiguity in the treatment of naturally occurring nuclides with low atomic numbers, because they are listed also as artificial nuclides, e.g., H-3, C-14, S-35, Na-22, etc.	Usefulness; Scope; Completeness; Quality Clarity				
7	General	The terms large quantities, moderate quantities and bulk quantities should be expanded for clarification of the methodology.	Usefulness; Scope; Completeness; Quality Clarity				
8	General	Within the scope, DS-161 should clarify that TS-R-1 should be referred to for exemption values for transportation activities. This is to clarify that TS-R-1 is an International consensus standard and applies to transportation-specific dose modeling.	Usefulness; Scope; Completeness; Quality Clarity				