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From: Robert Meck
To: ISCORS RECYCLE SUBCOMMITTEE
Date: Fri, Jan 17, 2003 9:43 AM
Subject: DS-161 Comments sent to IAEA WASSC Committee

Dear Colleagues:

Attached are the comments that NRC sent to the IAEA WASSC Committee on the DS-161 draft that I sent to you recently. For those that don't have WordPerfect they are also copied below:

1. I recommend that the document be revised to include nuclide-by-nuclide levels for the whole list of nuclides. Such a listing would be useful for implementation and should be consistent with what is already used elsewhere, such as the EC values.
2. The document might be simplified by listing radionuclides by decade as already calculated by consultants. This would not necessarily be all encompassing, but would certainly have the main contributors (Cs-137, Co-60, Sr-90, etc). This would reflect current uses and avoid oversimplification to the point that the values are not meaningful. This would alleviate the problem of having, for some nuclides, a factor of 100 greater than the 10 μ Sv/a, for example, Cs-137 and Co-60. The entire listing could be maintained in the accompanying safety report.
3. Also, there is a major difference in the approach used for artificial and natural radionuclides (which is justifiable), but the table does not indicate that there is such a difference. Levels for natural radionuclides should be clearly identified as NOT dose based. Levels for natural radionuclides could be listed in a separate table to clarify the different basis. However, the Safety Report should retain the calculations and results for natural radionuclides. I recommend that the natural radionuclides be kept at 0.5 Bq/g.
4. With respect to the title, it should be made clear that the guide specifies levels below which there is no need for regulatory consideration. Therefore, the title should be: Radioactivity in Material not requiring Regulation for Purposes of Radiation Protection.
5. IAEA should be cautious and ensure that the wording is such that it is a safety guide and not a requirements document.
6. Since the document has been significantly revised, I recommend that the document be resent to the Member States for their comment after review and approval by RASSC/WASSC and before being sent to CSS for their review (i.e., a further round of formal Member State consultation on the usual time scale).
7. Along with setting these values, we need to think through, in parallel, an approach for implementing practical aspects (e.g., measurement, volume averaging). For example, what can be measured at the borders?
8. Those applicable U.S. Member State comments that were submitted for the previous draft DS-161 and the Safety Report should be resolved.

Best regards,

Bob

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