



Rio Tinto Energy America
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PR 19, 20 and 50
(71FR55382)

14

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USNRC

11 December 2006

December 12, 2006 (2:16pm)

Secretary, U.S.
Nuclear Regulatory Commission,
Washington, DC 20555-0001
ATTN: Rulemakings and Adjudications Staff.

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

Gentlemen:

Subject: Kennecott Uranium Company Comments on Occupational Dose Records, Labeling Containers and the Total Effective Dose Equivalent – Federal Register / Vol. 71, No. 184 / Friday, September 22, 2006 / Proposed Rules pages 55382 to 55398 RIN 3150-AH40

Kennecott Uranium Company is a uranium recovery licensee (Source Material License SUA-1350) which operates and manages the Sweetwater Uranium Project, located in Sweetwater County, Wyoming. The Sweetwater Uranium Project is the last remaining conventional uranium mill in Wyoming and one (1) of the last four (4) remaining conventional uranium mills in the United States.

The following are Kennecott Uranium Company's comments on this rulemaking:

Annual Dose Report to Workers

Kennecott Uranium Company supports the change to the notification requirement in 10 CFR 19.13(b) so that licensees would be required to provide reports to occupationally exposed individuals whose annual dose exceeds 1 millisievert (mSv) (100 millirem (mrem)) TEDE or 1 mSv (100 mrem) to any individual organ or tissue in the preceding year for those individuals for whom monitoring was required under 10 CFR 20.1502, but not be required to provide unsolicited annual dose reports to those individuals for whom monitoring was required under 10 CFR 20.1502 whose annual dose does not exceed these limits. Individuals whose annual dose does not exceed these limits would still of course be provided with their dose reports upon request.

Cumulative Occupational Radiation Dose

Kennecott Uranium Company also supports the fourth proposed amendment to remove the provision in 10 CFR 20.2104(a)(2) that requires licensees to attempt to obtain the records of cumulative occupational radiation dose for each worker requiring monitoring under 10 CFR 20.1502. This has been a burdensome requirement that was difficult to fulfill. The reduced occupational dose limit of 0.05 Sv (5 rems) per year in the current 10 CFR 20.1201(a)(1)(i) essentially accomplishes the same goal as the previous dose limit of 0.03 Sv (3 rems) per calendar quarter constrained by the then age-dependent, cumulative lifetime dose limit.

In addition, in the uranium recovery industry, doses have historically been very low and maintenance of cumulative dose records for workers as they move from employer to employer is not required.

Kennecott Uranium Company appreciates the opportunity to comment on this rulemaking effort. If you have any questions please do not hesitate to contact me.

Sincerely yours,

Oscar Paulson
Facility Supervisor

cc: Katie Sweeney – National Mining Association (NMA)

Template = SECY-067

SECY-02

From: "Shelley Schutterle" <shelley@tribcsp.com>
To: <SECY@nrc.gov>
Date: Tue, Dec 12, 2006 12:04 PM
Subject: Comments on RIN 3150-AH40

Kennecott Uranium Company is regrettably aware that these comments are being submitted after the requested due date (Dec. 6). We would appreciate your consideration of the comments, if possible.

Thank you,

Shelley Schutterle
Shelley Schutterle, Administrative Coordinator
Kennecott Uranium Company
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Mail Envelope Properties (457EE105.7F1 : 8 : 55281)

Subject: Comments on RIN 3150-AH40
Creation Date Tue, Dec 12, 2006 12:04 PM
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TEXT.htm	3757	
tech.gif	862	
Comments on TEDE_Changes.pdf		122323
Mime.822	175702	

Options

Expiration Date: None
Priority: Standard
ReplyRequested: No
Return Notification: None

Concealed Subject: No
Security: Standard

Junk Mail Handling Evaluation Results

Message is eligible for Junk Mail handling
This message was not classified as Junk Mail

Junk Mail settings when this message was delivered

Junk Mail handling disabled by User
Junk Mail handling disabled by Administrator
Junk List is not enabled
Junk Mail using personal address books is not enabled
Block List is not enabled