

From: Einar Ronningen <eronnin@smud.org>
To: <nrcprep@nrc.gov>
Date: Mon, Apr 16, 2007 11:32 AM
Subject: Response from "Comment on NRC Documents"

1/16/07
72 FR 1708
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Below is the result of your feedback form. It was submitted by

Einar Ronningen (eronnin@smud.org) on Monday, April 16, 2007 at 11:32:33

Document_Title: MARSAME (Mult-Agency Radiation Survey and Assessment of Materials and Equipment Manual)

Comments: The NRC does not take a risk-based approach to clearance of materials from radiologically controlled areas. The current standard is "not detectable" and can be implemented using the guidance of Regulatory Guide 1.86, NRC I.E. Circular 81-07, NRC I.N. 85-92.

MARSAME, like the parent document MARSSIM, is meant to be applied to a risk-based release standard.

In the absence of a release standard equivalent to the License Termination Rule (Sub-Part E of 10 CFR 20), application of MARSAME is impractical for free-release surveys at operating power plants.

Current decision methods are simple: if radioactivity is detected, the material may not be cleared. Statistical interpretation is not necessary and in the absence of a risk-based standard, introduces a level of complexity that will drive nuclear the industry away from performing clearance surveys. This will result in burial of potentially clean material as radioactive waste.

In light of the current state of radioactive waste legislation and the disposition options available to the industry, the limited space available for radioactive waste disposal should be managed as a limited resource, which would be used unnecessarily for "clean" material if MARSAME to be implemented.

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Subject: Response from "Comment on NRC Documents"
Creation Date Mon, Apr 16, 2007 11:32 AM
From: Einar Ronningen <eronnin@smud.org>

Created By: eronnin@smud.org

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MESSAGE	1743	Monday, April 16, 2007 11:32 AM
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