



NUCLEAR ENERGY INSTITUTE

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1/16/07
72 FR 1708

June 21, 2007

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2007 JUN 28 AM 9:05

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Chief, Rulemaking, Directives and Editing Branch
Division of Administrative Services
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Comments on Draft NUREG-1575, Sup. 1, "Multi-Agency Radiation Survey and Assessment of Materials and Equipment Manual," (72 Federal Register 1709, January 16, 2007)

Project Number: 689

The Nuclear Energy Institute (NEI)¹ offers the following comments on the subject Federal Register notice, which solicited public comments on draft NUREG-1575, Supplement 1, "Multi-Agency Radiation Survey and Assessment of Materials and Equipment (MARSAME) Manual" (hereafter referred to as the "MARSAME Manual." The MARSAME Manual is intended to provide a multi-agency consensus document on planning, conducting, evaluating, and documenting radiological surveys for demonstrating compliance with measurable action levels.

The subject Federal Register notice requested that reviewers focus on the technical accuracy and understandability of the MARSAME Manual and also provide comments in response to several questions posed in the Federal Register notice.

Our review has not identified any technical inaccuracies in the MARSAME Manual. The information contained in the MARSAME Manual is understandable and is presented in a logical sequence.

As a multi-agency consensus document, the MARSAME Manual can add value by providing a common technical basis and underlying methodology for planning, conducting, evaluating, and documenting radiological surveys for demonstrating compliance with agencies' different regulatory standards and criteria applicable to disposition of materials and equipment containing regulated radioactive material. We do not believe that the MARSAME Manual should serve directly as guidance

¹ NEI is the organization responsible for establishing unified nuclear industry policy on matters affecting the nuclear energy industry, including the regulatory aspects of generic operational and technical issues. NEI's members include all utilities licensed to operate commercial nuclear power plants in the United States, nuclear plant designers, major architect/engineering firms, fuel fabrication facilities, materials licensees, and other organizations and individuals involved in the nuclear energy industry.

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to regulatory agency staff or licensees. We recommend that NRC use the MARSAME Manual, when finalized and issued, only as a technical basis document to aid in developing practical and implementable guidance in the form of a regulatory guide (or guides) for specific applications. In doing so, we encourage the NRC to avoid cross-referencing sections of the MARSAME Manual, but rather to develop a stand-alone guide (or guides) that is concise and simple to use without the need to directly refer to the MARSAME Manual. A good example of this approach is Regulatory Guide 8.15, *"Acceptable Programs for Respiratory Protection,"* and the underlying technical basis document, NUREG-0041, *"Manual of Respiratory Protection Against Airborne Radioactive Materials."*

Thank you for your consideration of these comments. Please contact me if you would like to discuss these comments further or desire additional information.

Sincerely,

A handwritten signature in black ink that reads "Ralph L. Andersen". The signature is written in a cursive style with a prominent initial "R".

Ralph L. Andersen

c: NRC Document Control Desk