

Doris Mendiola - Comments - NUREG 1556, Vol. 21

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To: <TMT@NRC.GOV>
Date: 07/10/2007 10:06 AM
Subject: Comments - NUREG 1556, Vol. 21
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12 FR 29555
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Ms. Torre Taylor
Office of Federal and State Materials
And Environmental Management Programs
U.S. Nuclear regulatory Commission
Washington, D.C. 20555-0001

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Dear Ms. Taylor,

The Illinois Emergency Management Agency, Division of Nuclear Safety, has reviewed the draft NUREG-1556, Volume 21, *Consolidated Guidance About Materials Licenses, Program-Specific Guidance About Possession Licenses for Production of Radioactive Material Using an Accelerator*. We appreciate the opportunity to comment on this important guidance document. This NUREG is generally a very good document and will help Agreement States and NRC license accelerators with some degree of consistency. Specific comments on the draft document are as follows:

- 8.5.1 - References a request for use of radionuclides with atomic number 1-83. Yet the guidance also references use of radium, which has an atomic number of 88, which is higher than 83. It appears the range of atomic numbers 1-83 should be increased as there are a number of radionuclides with atomic numbers > 83 that are accelerator produced. This would be more efficient than listing other radionuclides that are outside of this range as line items on the license.
- 8.7 - The training section should reference the DOT hazardous materials training required every 3 years if the licensee is shipping radioactive materials.
- 8.9 - The licensee should be required to submit shielding calculations of the accelerator room as this will also have radioactive material in it coming from the targets. NRC did not require the submittal of such details e.g., construction materials, densities, distances, etc. for the reviewer to be able to perform their own calculations. The application does request submittal of a design and description of shielded areas, but

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he Appendix G describes shielding used for bench tops, containers, glove boxes, etc. and does not mention shielding in the production areas.

Shielding may also be necessary around duct work and any type of remote delivery systems employed.

The licensee should specify where on the diagram that intake/exhausts and the nearest intake to the exhaust so the reviewer can evaluate airborne hazards to adjacent facilities.

8.10.3 - States, "Sources in storage that are used infrequently may not require leak testing." This implies that just because they are infrequently used that they do not have to be tested. I recommend that a clarification statement be added that if they have not been tested in the last 6 months (3 for alpha) and they are removed from storage for use, that they must be leak tested prior to use.

8.10.6 - States the procedures that "should" be developed. It also states the applicant "should" make a statement regarding making changes to the procedures and not a commitment that they'll develop and implement the procedures that "should" be developed. Technically, they do not have to develop the proposed NRC procedural topics nor address the changes since the directive is "should."

There is no mention of servicing the accelerator or training and procedures for employees conducting service.

The only mention of distribution is that of a consortium for noncommercial use and is limited to PET. There is no mention of commercial distribution, procedures or packaging of product prior to distribution. Additionally, there is no mention of product return or procedures for receipt of returned product whether it is waste or unused product.

There is no mention of recall of product produced by the licensee or tracking trends in production problems.

Survey frequency information and tables are a good addition to the NUREG guidance.

We apologize for the delay in forwarding these comments. As you know, we all have been pressed into the review of requirements for new Increased Controls. These have been designated as a higher priority by your agency. Nevertheless, we hope you will consider our comments on NUREG 1556. Vol. 21 seriously and make the appropriate changes.

Regards,

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