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**From:** Greg Yuhas [gyuhas@berkeley.edu]
**Sent:** Thursday, August 19, 2010 7:28 PM
**To:** NRCREP Resource
**Subject:** Response from "Comment on NRC Documents"

Below is the result of your feedback form. It was submitted by

Greg Yuhas (gyuhas@berkeley.edu) on Thursday, August 19, 2010 at 19:28:19

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Document_Title: DG-4018 CONSTRAINT ON RELEASES OF AIRBORNE RADIOACTIVE MATERIALS TO THE ENVIRONMENT FOR LICENSEES OTHER THAN POWER REACTORS

Comments: Comments: NRC Draft RG, DG-4018

1. The Draft does not mention how this Regulatory Guide will apply to Agreement State and general licensees.
2. The term "sealed sources" presented in paragraph three under as Low As Reasonably Achievable, lacks clarity. Revise the sentence to read: "These licensees, which include radiographers, well loggers, and other users of sealed sources manufactured pursuant to an NRC or Agreement State issued Sealed Source and Device Registry (SSDR) number, do not need to take actions to demonstrate that they meet the constraint on air emissions of radioactive material to the environment." This change would add clarity and a recognized level of safety significance to the term "sealed source." In addition, reference to the SSDR provides a level of confidence the sources are periodically checked for leakage.
3. Change the third sentence under "Constraints," to read: "The constraint, in this case, may be interpreted as that fraction of the public dose limit allocated to air emissions to assure exposures are ALARA through this particular release pathway."
4. Under C. Regulatory Position, item 1, second sentence should be changed to recognize that EPA approved models, such as COMPLY and CAP-88, are authorized for use without prior NRC granted exception.
5. Regulatory Position, section 1. b. introduces the term "sealed container." The concept of sealed containers is important and should be discussed. For example: Sealed containers are containers used to store radioactive materials that would not be expected to release their contents under conditions of normal of use; normal use does not include, fire, earthquake, floods, dropping onto an unyielding surface or exposure to environmental conditions that would be expected to challenge the integrity of the container during the year. A sealed steel paint and flame-sealed quartz vial would be expected to effectively contain dispersible radioactive material during conditions of normal use, however both would fail if crushed or exposed to fire. A plastic bag exposed to direct sunlight would be expected to deteriorate during the year and should not be considered a sealed container under those circumstances.
6. Regulatory Position, section 2. B. assumes the "air concentration measured at the point of release." In many cases, the air concentration is estimated, not measured, as permitted by 10 CFR20. When calculating the fraction of material released, the license should be directed to Table 1 of ANSI/HPS N13.1-1999 or EPA 520/1-89-001 for acceptable release fractions from solid, liquid or gaseous forms of radioactive material.

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SUNSI Review Complete
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