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RECORD #72

TITLE: Guide on "How Hard You Have To Look" As Part of Radioactive Contamination Control Program

FICHE: 67775-088



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

*Bob
Cunningham*
Congratulations!!
Bob

MAY 18 1982

Mr. E. Douglas Swartz
Nuclear Licensing Administrator
Commonwealth Edison Company
Post Office Box 767
Chicago, Illinois 60690

Dear Mr. Swartz:

This is in reply to your letter to me dated February 4, 1982 in which you stated that the intent of IE Circular No. 81-07, "Control of Radioactively Contaminated Material," was not clear. You also requested that the NRC concur with release criteria contained in Commonwealth Edison Company's "Radiation Protection Standards." Mr. Cunningham of my staff discussed the reason for this request with you on April 21, 1982. I understand the purpose was to facilitate release of old fuel storage racks and that the plans for release of the fuel storage racks are no longer active.

The intent of the circular was to provide guidance on acceptable limits of detection of portable survey equipment, thus defining "how hard you have to look" for radioactivity when the use of portable survey equipment is necessitated as part of a radioactive materials control program. As you know, low background, fixed laboratory counting equipment can readily detect levels of radioactivity several orders of magnitude less than the detection levels discussed in the circular. However, use of laboratory counting equipment is not always practical for all situations and portable survey equipment may need to be employed.

The circular did not establish criteria for releasing radioactively contaminated materials from restricted areas for unrestricted use. The regulations applicable to nuclear power reactor licensees do not provide for release of materials for unrestricted use that are known to be radioactively contaminated at any level. Authorization for disposal of specific radioactively contaminated materials may be requested as specified in 10 CFR 20.302. The Commission recognizes the need for a "de minimis" classification of wastes and has initiated work to define "de minimis" levels on a specific waste basis. This work is continuing.

MAY 18 1982

With regards to your request for concurrence with release criteria contained in your "Radiation Protection Standards," we cannot concur since the regulations do not contain release criteria provisions as described above. The method available to you for obtaining authorized release limits is to submit to the Office of Nuclear Reactor Regulation (NRR) a request for license amendment that addresses specific release limits. Although we have sent a copy of your letter to NRR for information, the excerpt you provided from your "Radiation Protection Standards" lacks specifics which would support a request for specific release limits for radioactively contaminated materials.

If you desire a specific authorization for disposal or a license amendment for specific release limits, please direct your request to the Office of Nuclear Reactor Regulation.

Sincerely,

Richard C. DeYoung, Director
Office of Inspection and Enforcement

bcc: H. R. Denton, NRR
J. G. Keppler, RIII
F. Congel, NRR
L. R. Greger, RIII
J. M. Taylor, IE

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