

From: Burrows, Ronald
Sent: Friday, April 08, 2011 1:03 PM
To: rblubaugh@powertechuranium.com
Cc: Christopher S. Pugsley (cpugsley@athompsonlaw.com); Lancaster, Thomas; Kurian, Varughese
Subject: Clarification of RAI 6.4-7

Dear Mr. Blubaugh:

During the public meeting this morning, a question was raised on the application of the radium benchmark dose to surface activity on structures remaining after decommissioning. I am providing the following to help clear up any confusion. Please let me know if you have additional questions.

1. The wording of RAI 6.4-7 is taken directly from 10 CFR 40, Appendix A, Criterion 6(6) .
2. UR facilities are subject to 10 CFR 40, Appendix A, Criterion 6(6) as described in the Final Rule for Radiological Criteria for License Termination of Uranium Recovery Facilities (The Rule) (64 FR 17506).
3. This criteria is different from the criteria in 10 CFR 20, Subpart E, Radiological Criteria for License Termination. The Rule contains provisions for applying the benchmark dose to surface activity on structures remaining after decommissioning.
4. NUREG-1569, Appendix E, Section E2.2 specifically discusses the implementation of the benchmark dose as it is applied to the surfaces of structures remaining after decommissioning.

Regards,

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