

**NRCREP Resource**

**From:** Elisa Dowell [laurie.dowell@pentagon.af.mil]  
**Sent:** Friday, June 29, 2012 3:11 PM  
**To:** NRCREP Resource  
**Subject:** Response from "Comment on NRC Documents"

2012 JUL 11 AM 2:41

5/30/2012  
771-R-31894

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

Elisa Dowell (laurie.dowell@pentagon.af.mil) on Friday, June 29, 2012 at 15:11:10

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Document Title: Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Portable Gauge Licenses – Draft Report for Comment (NUREG-1556, Volume 1, Revision 2)

Comments: 29 Jun 2012

The Air Force Radioisotope Committee Secretariat submits the following comments concerning "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Portable Gauge Licenses – Draft Report for Comment (NUREG-1556, Volume 1, Revision 2)" in response to the Federal Notice for public comment.

1. Radiation Survey Requirements.

NUREG 1556, volume 1, does not require radiation surveys following transport of the source. However, 10 CFR 20.1906(f) suggests Licensees are required to survey for radiation levels to ensure a source is still properly lodged in its shield when transferring special form sources in licensee-owned or licensee-operated vehicles to and from a work site. This requirement appears appropriate for portable density gauges as failure of the sliding tungsten shields to close properly will partially expose the source. Please clarify this contradiction as it applies to Portable Density Gauge Licensees.

2. Tamper Seals.

NUREG 1556, volume 1, does not require a tamper seal when transporting the source. However, 49 CFR PART 173.412 requires "Type A packaging be designed so that the outside of the packaging incorporates a feature, such as a seal, that is not readily breakable, and that, while intact is evidence that the package has not been opened." This requirement does not seem appropriate for transport of portable density gauges by the Permittee. Please clarify how the regulation for a tamper seal applies to Portable Density Gauge Licensees?

3. Appendix I – Leak Testing.

a. The formula for provided in the NUREG is only appropriate if the sample and background count time are the same. Please state this restriction or provide a more general equation.

b. The NUREG instructions for estimating instrument efficiency, neglected to state that the calibration source must be in the same configuration as the sample.

c. The NUREG requires the use of a NIST traceable source with an accuracy of + 5%. However, there is no requirement for the number of source counts that must be collected. The number of source counts has a direct effect on the statistical accuracy of the efficiency; i.e., 10000 source counts provides an additional 1% error, 1000 counts a 3% error, 100 counts a 10% error. Suggest a minimum number of source counts be collected, so the efficiency calculation will maintain the low statistical accuracy you are suggesting.

d. The NUREG stated that leak test analysis results be reported in "millicuries" rather than "microcuries" as has traditionally been required. Is this an oversight or have the reporting requirements changed?

SONSI Review Complete  
Template = ADM-013

FREDS = ADM-03  
Call = P. Herrera  
(4x42)

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