

## **Question**

This is a follow up to the "Response to NRC Request for Additional Information on License Amendment Request (LAR) 12-10 Related to the Environmental Assessment for Capacity Expansion of URENCO USA Facility (TAC NO.L34227)," LES-13-00100-NRC, dated July 31, 2013.

In the response to the RAI 3, some doses to construction workers exceed allowable limits for the public. Please clarify the status of these workers. Are these construction workers considered to be (and have the relevant training to be classified as) radiation workers?

## **UUSA Response**

From 10CFR20, 20.1003 Definitions:

*Member of the public* means any individual except when that individual is receiving an occupational dose.

*Occupational dose* means the dose received by an individual in the course of employment in which the individual's assigned duties involve exposure to radiation or to radioactive material from licensed and unlicensed sources of radiation, whether in the possession of the licensee or other person.

10CFR19.12 sets the requirements for the knowledge base that occupational workers must receive. The URENCO USA (UUSA) GET program has been audited by RP to ensure that UUSA meets the minimum as required by this regulation. All contract construction workers and UUSA employees must complete GET to have unescorted badge access to the facility.

Based on these definitions and the content of GET program, construction workers who would have access to the facility for the site build out are not members of the public. The construction workers in this situation are occupational workers. As a result they require monitoring consistent with the requirements of 10 CFR 20.1502.

Summarizing section 20.1502, if the individuals were to receive 500 mRem or greater per year they require monitoring. It is unlikely that any individual would receive exposures approaching this limit outside posted Radioactive Material Areas (RMA). The posting requirement that ensures unmonitored workers are maintained below an exposure of 500 mRem/year is controlled with Procedure RP-3-2000-02 rev 10, Posting and Access Control. Thus, UUSA RMA postings at the 250uRem/hr, which also dictate dosimetry to cross, ensure no unmonitored occupational worker exceeds the limits of section 20.1502.

Finally, the dose calculations provided in the recent RAI are based on a worst case scenario with a maximum source term located on the UBC pad. The reality is that based on occupancy and normal source term load this construction group would not receive in excess of 100 mRem/year. To support this premise, additional area TLDs will be staged to document the exposures at the closest points of access to the UBC pad. Should these TLDs indicate exposure would exceed 100 mRem/year, then additional monitoring will be established.