

Mendiola, Doris

Subject: FW: OAS Comments on FSME-13-118 (DG-8031)
Attachments: FSME-13-118 Reg Guide 8 34 Comments.pdf

From: Welling, Mike (VDH) <Mike.Welling@vdh.virginia.gov>
To: Bladey, Cindy
Cc: White, Duncan
Sent: Fri Dec 20 08:37:07 2013
Subject: FW: OAS Comments on FSME-13-118 (DG-8031)

FYI

From: Welling, Mike (VDH)
Sent: Friday, December 20, 2013 8:11 AM
To: 'David.Spackman@nrc.gov'
Subject: OAS Comments on FSME-13-118 (DG-8031)

Attached are the OAS Board comments. Thanks.

Michael Welling
Director Radioactive Materials Program
Virginia Dept of Health
109 Governor St, 7th Floor
Richmond, VA 23219
(T) 804-864-8168
(F) 804-864-8155

<http://www.vdh.virginia.gov/Epidemiology/RadiologicalHealth/>

From Vince Lombardi: "The achievements of an organization are the results of the combined effort of each individual"

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Template = ADM - 013
E-RIDS= ADM-03
Add= H. Karagiannis (bxk)
D. Lewis (dela)



Mike Welling, Chair, Virginia
Alan Jacobson, Past-Chair, Maryland
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Megan Shober, Secretary, Wisconsin
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Michael Ortiz, Director, New Mexico

December 24, 2013

David Spackman
Office of Federal and State Materials and Environmental Management Programs
U. S. Nuclear Regulatory Commission
Washington, DC 20555

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RULES AND DIRECTIVES
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RE: Request for Comments on the Draft Regulatory Guide DG-8031, "Monitoring Criteria and Methods to Calculate Occupational Radiation Doses (FSME-13-118)

Dear Mr. Spackman,

The Organization of Agreement States (OAS) Executive Board (Board) has reviewed the above document and respectfully submits the following comments for consideration by the NRC.

1. The NUREG-1556 series should be revised to include verbiage in the "Occupational Dosimetry" section that the licensee should use Regulatory Guide 8.34.
2. There is inconsistent use of both "rem" and "rems" as the plural for "rem". The problem is throughout the document, for example the last paragraph on page 3.
3. Page 1, Purpose: Should be broadened to "It applies to all facilities required to perform occupational monitoring under USNRC and/or Agreement State regulations." This change would allow Agreement States to apply these provisions to all regulated entities who are required to calculate occupational radiation doses.
4. Page 4, first "Surveys" paragraph: add a 'F' to "10 CR"
5. Page 5, 2nd paragraph under "Recording and Reporting of Monitoring Results": Recommend deleting the last sentence.
6. Page 5, 1st paragraph under "Monitoring Levels": Change first sentence to "10 CFR 20.1502 requires licensees to monitor..."
7. Page 5, 1st paragraph under "Monitoring Levels": delete both occurrences of "whole". This technique is most often used for extremity monitoring, not "whole body" monitoring.
8. Page 7, the Note under section 1.a) doesn't fit. Recommend deleting, or merging with the last sentence of the paragraph under "Monitoring Criteria".
9. Page 8, 2nd paragraph. Delete the sentence "In the same 1995 rulemaking...". This information is stated in the previous paragraph.
10. Page 8, 2nd paragraph. The last sentence "In addition, the 1995 rule change..." should be moved to the end of the last paragraph on page 7. This sentence is about

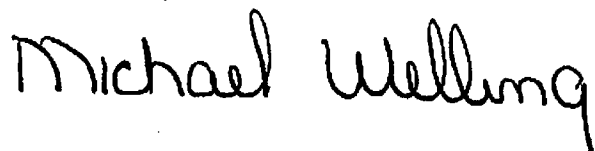
Alabama, Arizona, Arkansas, California, Colorado, Florida, Georgia, Illinois, Iowa, Kansas, Kentucky, Louisiana, Maine, Maryland, Massachusetts, Minnesota, Mississippi, Nebraska, Nevada, New Hampshire, New Jersey, New Mexico, New York, North Carolina, North Dakota, Ohio, Oklahoma, Oregon, Pennsylvania, Rhode Island, South Carolina, Tennessee, Texas, Utah, Virginia, Washington, Wisconsin

occupational dose and should be with the paragraph about occupational dose, not with the paragraph about public dose.

11. Page 8, "Classification of Individuals": the Note should be deleted. It has nothing to do with classifying workers and the information was already stated in this section (see previous comment).
12. Page 11, "Determining the Intake based on Bioassay Measurements": Should read "in-vivo" bioassay instead of in vitro"
13. Page 11, Section 4 a) (2): Should the information in the Note in this section also be included in an update of NUREG/CR-4884?
14. Page 12, last paragraph under d): Eliminate the phrase "by using the mathematical fact". Either show the relevant equation, or just say that licensees may demonstrate the TODE limit is met by showing that the DDE is less than 5 rem and the CEDE does not exceed 1 rem.
15. Page 12, Section 4 d): Can the NRC clarify where the information regarding the 1 rem CEDE issue comes from?
16. Page 19, Uranium Intake Limitation: Recommend deleting this section because there's no guidance included with this regulatory statement.
17. Page 20, Reference 9: Spell out "Regulatory Guide" to match References 4-7.

We appreciate the chance to comment on this subject, and stand ready to answer any questions you may have.

Sincerely,

A handwritten signature in black ink that reads "Michael Welling". The signature is written in a cursive, slightly slanted style.

Michael Welling
OAS Chair
Director Radioactive Materials Program
Virginia Dept of Health
109 Governor St, Room 730
Richmond, VA 23219