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Monitoring Criteria and Methods to Calculate Occupational Radiation Doses

Comment On: NRC-2013-0234-0001
Monitoring Criteria and Methods to Calculate Occupational Radiation Doses

Document: NRC-2013-0234-DRAFT-0003
Comment on FR Doc # 2013-25258

10/25/2013
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4

Submitter Information

Name: Oscar Paulson

General Comment

Comments of Kennecott Uranium Company, Rawlins, WY 82301

Attachments

Comments-NRC-RegGuideDG_80311

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 Add= H. Karagiannis (hxk)
 D. Lewis (det 1)

Kennecott Uranium Company
42 Miles NW of Rawlins
P.O. Box 1500
Rawlins, WY 82301-1500
USA
T +1 (307) 328 1476

December 18, 2013

Ms. Cindy Bladey, Chief
Rules, Announcements, and Directives Branch (RADB)
Office of Administration
Mail Stop: 3WFN, 06-44M
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Dear Ms. Bladey:

**Subject: Docket ID NRC-2013-0234
Kennecott Uranium Company Comments *DRAFT REGULATORY GUIDE DG-8031
MONITORING CRITERIA AND METHODS TO CALCULATE OCCUPATIONAL
RADIATION DOSES* Federal Register / Volume 78, Number 207 / Friday, October 25,
2013 / Notices, pages 64030 to 64031**

Kennecott Uranium Company is a uranium recovery licensee that owns the Sweetwater Mill located in the Great Divide Basin in Sweetwater County, Wyoming. Kennecott Uranium Company has reviewed the draft regulatory guide and has the following comments:

General Comments

Kennecott Uranium Company agrees with the concept of redefining the Total Effective Dose Equivalent (TEDE) such that:

$$\text{TEDE} = \text{EDEX} + \text{CEDE}$$

The use of EDEX (Effective Dose Equivalent for External Exposure) is preferable in the case of non-uniform radiation fields. While non-uniform radiation fields are generally not encountered in uranium recovery operations, they could be, in cases where nuclear density gauges are used within a mill to measure slurry densities in pipes or in cases involving the use of downhole logging sources or neutron generators. Thus, Kennecott Uranium Company supports this change.

Occupational Dose Monitoring at Levels Sufficient to Demonstrate Compliance

When discussing occupational dose monitoring requirements, the current version of Regulatory Guide 8.34, Regulatory Position C1.1 states:

"The potential for unlikely exposures and accident conditions need not be considered because these events, by definition, are unlikely".

The draft revision in Regulatory Position C.2.c (*Occupational Dose Monitoring at Levels Sufficient to Demonstrate Compliance*) does not include a similar statement. Absent the above language, a licensee may now have to postulate unlikely scenarios and estimate their related occupational dose. Kennecott Uranium Company requests that the language above from the original regulatory guide be retained in the revision.

Engineering Controls and Respiratory Protection

Regulatory Position C.2.e (pg. 9) states that licensees:

"...may take credit for the use of ... respiratory protection when determining the need for internal dose monitoring".

For clarity it should be stated that this allowance only applies to respiratory protection used in accordance with a respiratory protection program that meets the requirements of 10 CFR §20.1703. Kennecott Uranium Company requests this change.

Recording and Reporting of Monitoring Results

This section states:

The results of monitoring when voluntarily provided, but not required by 10 CFR 20.1502, are not subject to the dose recording or reporting requirements in 10 CFR Part 20, Subpart L, "Records" or Subpart M, "Reporting." However, licensees may voluntarily provide these reports to the exposed individual(s) and to the NRC. The results of the voluntary monitoring also may be used in a prospective assessment to determine the need for future monitoring.

Kennecott Uranium Company supports this language since it clarifies issues regarding voluntary monitoring. Most uranium recovery operations, including the Sweetwater Uranium Project, have external doses that are below ten (10) percent of the limits in § 20.1201(a) and are not required to perform monitoring for external dose; however they do so anyway to document the low external doses received by their workers. As such, this language is useful.

Kennecott Uranium Company appreciates the opportunity to comment on this draft regulatory guide. If you have any questions please do not hesitate to contact me.

Sincerely yours,



Oscar Paulson
Facility Supervisor

cc: Katie Sweeney – National Mining Association (NMA)
Rich Atkinson