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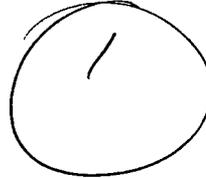
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November 12, 2014



Ms. Cindy Bladey  
Office of Administration  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001  
ATTN: Adjudicatory and Rulemaking

**Subject:** Industry Comments on Draft Interim Staff Guidance XY, Revision 0 on Acute Uranium Exposure Standards; Docket NRC-2014-0173; (79 FR 55834)

**Project Number: 689**

Dear Ms. Bailey:

On behalf of the nuclear industry, the Nuclear Energy Institute (NEI)<sup>1</sup> has reviewed the subject Draft Interim Staff Guidance (ISG) on Acute Uranium Exposure Standards and fully supports its issuance in final form at the earliest possible opportunity. This ISG will inform facility-specific Integrated Safety Analyses and it offers a more risk-informed approach to acute uranium exposure standards. We are pleased that the 2008 industry-generated white paper on this topic informed the Draft ISG, and that this issue is being brought to closure in the near term through an implementable path forward.

We offer the following specific comments for clarity:

1. B. Discussion section: Based on the 2013 *Toxicological Profile for Uranium* issued by the Agency for Toxic Substances and Disease Registry as referenced by NRC, the Draft ISG should clearly state that there are no documented human deaths from exposure to uranium for any route of exposure.<sup>2</sup>
2. B. Discussion section, sentence 5: NRC should consider beginning the sentence with "Any damage" rather than "The damage" since an "acute" exposure is often times interpreted as resulting in severe damage, although "acute" is also used to describe a brief exposure that does not result in any damage.

<sup>1</sup> The Nuclear Energy Institute (NEI) is the organization responsible for establishing unified industry policy on matters affecting the nuclear energy industry, including the regulatory aspects of generic operational and technical issues. NEI's members include all entities licensed to operate commercial nuclear power plants in the United States, nuclear plant designers, major architect/engineering firms, fuel cycle facilities, nuclear materials licensees, and other organizations and entities involved in the nuclear energy industry.

<sup>2</sup> See 2013 *Toxicological Profile for Uranium*, ATSDR, sections 3.2.1.1 (page 48), 3.2.2.1 (page 109) and 3.2.3.1 (page 162).

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**SUNSI Review Complete**  
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Add= J. Hammerman (Jehg)

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3. Page 3, Footnote 1: NRC staff may want to determine whether the paper authored by Leggett et al in 2012 was revised since then and, if so, whether the Draft ISG language is impacted.
4. D. Technical Review Guidance: The parenthetical reference to "class F" material should be corrected to read "Type F" material consistent with other references in the Draft ISG.

Again, we appreciate NRC bringing this generic regulatory issue to closure and look forward to reviewing the final version of the ISG in the near future. Please do not hesitate to contact me if you have questions about our suggested edits.

Sincerely,



Janet R. Schlueter

c: Ms. Marissa G. Bailey, NMSS/FCSE, NRC  
Mr. James Hammelman, NMSS/FCSE/FMB, NRC  
Mr. Anthony Gody, RII/DFFI, NRC