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Applications of Bioassay for Uranium

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Applications for Bioassay for Uranium

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Submitter Information

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General Comment

See attached file(s)

1

Attachments

NRC-2014-0210-uranium-bioassay-public-comment-porterfield-2014nov29-final

SUNSI Review Complete

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Add= J. Parks (JDPH)

November 29, 2014

Ms. Cindy Bladey
Office of Administration
Mail Stop: 3WFN-06-A44M
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001.

DG-8054, "Applications of Bioassay for Uranium"
Docket number NRC-2014-0210

Dear Ms. Bladey,

The following comments are in response to the October 6, 2014 Federal Register notification (Vol. 79, No. 193, p. 60190-60191) inviting public comment on NRC-2014-0210 and the associated draft regulatory guide (DG) DG-8054, "Applications of Bioassay for Uranium".

Comment 1

The content below specifically calls out the application of NQA-1-1994 as the basis for the quality system for the laboratory performing the bioassay analysis. In the mentioned spirit of international harmonization I would suggest consideration of alternatively permitting the use of ISO 17025, "General requirements for the competence of testing and calibration laboratories" as the basis for mentioned quality system. I believe ISO 17025 is much more applicable and focused on testing laboratories than NQA-1-1994 and would allow for a more effective implementation.

A. Introduction, Applicable Rules and Regulations

"The NRC regulation, 10 CFR part 76, "Certification of Gaseous Diffusion Plants," requires a quality assurance (QA) program satisfying the applicable provisions of the American Society of Mechanical Engineers (ASME) standard NQA-1-1994, "Quality Assurance Program Requirements for Nuclear Facilities (with Addenda)" (Ref. 4)."

Comment 2

The content of DG-8054 focuses on the natural uranium isotopes U-234, U-235, and U-238. I have to wonder if there could be situations involving reprocessed uranium from high-burn reactor systems in which other non-naturally occurring uranium isotopes should be quantified in order to completely assess a possible intake dose.

In closing I would like to express my appreciation to the Nuclear Regulatory Commission for the opportunity to provide public comment on this topic.

Sincerely yours

Mr. Donovan Porterfield
Los Alamos, NM 87544