

October 1, 2015

MEMORANDUM TO: Marissa Bailey, Director  
Division of Fuel Cycle Safety, Safeguards,  
and Environmental Review  
Office of Nuclear Material Safety  
and Safeguards

FROM: Robert Johnson, Chief **/RA/**  
Fuel Manufacturing Branch  
Division of Fuel Cycle Safety, Safeguards,  
and Environmental Review  
Office of Nuclear Material Safety  
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SUBJECT: INTERIM STAFF GUIDANCE ON ADDITIONAL GUIDANCE FOR  
CONDUCTING A CHEMICAL SAFETY REVIEW RELATED TO ACUTE  
CHEMICAL EXPOSURES AND THE PROPOSED QUANTITATIVE  
STANDARDS USED TO ASSESS THE CONSEQUENCES FOR THE  
INTEGRATED SAFETY ANALYSIS

The draft interim staff guidance (ISG) on additional guidance for conducting a chemical safety review related to acute chemical exposures and the proposed quantitative standards used to assess the consequences for the Integrated Safety Analysis was issued for public comment in the *Federal Register* on March 4, 2015, with a request for comments by May 18, 2015. The comment period was extended to July 1, 2015, by an April 17, 2015, *Federal Register* notice (FRN) which presented additional information related to backfitting.

The Nuclear Energy Institute (NEI) submitted a letter on June 30, 2015 that provided comments on the draft ISG and reiterated NEI's position. Some of NEI's comments requested clarification of the ISG. Other comments pointed out a perceived inadequacy of the toxicity information sources identified in the ISG or the difficulty of establishing precision exposure standards. The letter also commented on information about historical exposure events that was contained in the second FRN.

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Westinghouse Electric Co. submitted a comment letter on June 30, 2015, which endorsed the NEI comments and also commented about the characterization of a historical exposure event identified in the second FRN.

An anonymous commenter supported the draft ISG. A second anonymous commenter noted an NEI proposal to limit the chemical consequence criteria in 70.61 to inhalation exposure to Hydrogen Fluoride. This proposal was rejected by the U.S. Nuclear Regulatory Commission as the regulations for Subpart H of Title 10 of the Code of Federal Regulations Part 70 were being developed. This commenter also supported the draft ISG.

BWXT submitted a comment letter on July 10, 2015, which also endorsed the NEI comments and commented on the characterization of a historical exposure event identified in the second FRN.

Enclosure 1 shows the disposition of the comments received on the draft ISG. Only comments related to the ISG were included in Enclosure 1. Additionally, a few minor changes were made to the ISG for further clarification. Enclosure 2 presents the final ISG recommended for issuance.

Staff recommends issuance of this ISG and subsequent actions necessary to address public comments and satisfy actions directed by SRM-SGB150501-1.

Enclosure:

1. Public Comments Resolution Table
2. Interim Staff Guidance

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