

RULES AND DIRECTIVES  
BRANCH  
USNRC

# PUBLIC SUBMISSION

2014 FEB 27 AM 10:46

<b>As of:</b> February 27, 2014 <b>Received:</b> February 26, 2014 <b>Status:</b> Pending_Post <b>Tracking No.</b> 1jy-8anw-9igi <b>Comments Due:</b> February 26, 2014 <b>Submission Type:</b> Web
--

**Docket:** NRC-2014-0006

Consolidated Guidance About Materials Licenses Program-Specific Guidance About Licenses of Broad Scope

**Comment On:** NRC-2014-0006-0001

Draft Program-Specific Guidance About Licenses of Broad Scope

**Document:** NRC-2014-0006-DRAFT-0002

Comment on FR Doc # 2014-01490

1/27/2014  
79 FR 4360

## Submitter Information

**Name:** Anonymous Anonymous

①

## General Comment

Sewer discharge

Clarification is requested as to whether or not compliance with 10 CFR 20.2003 (or Agreement State equivalent) is sufficient or whether additional compliance with local resolution is also required.

A local sewer district states that a discharge of any radioactive liquid waste into the sanitary sewer according to 10 CFR 20.2003 is a violation of local sewer resolution. The district claimed that such a discharge had to be approved by the district even though the district resolution didn't define "radioactive waste." State regulators (an Agreement State) stated that local governments could make more restrictive rules than the federal and state regulations for radiation protection and didn't see an issue with the district's claim.

It is my understanding based on the below citation (42 USC § 2021) that local regulators cannot preempt federal radiation protection regulations.

42 USC § 2021

(k) State regulation of activities for certain purposes

Nothing in this section shall be construed to affect the authority of any State or local agency to regulate activities for purposes other than protection against radiation hazards

**SUNSI Review Complete**

Template = ADM - 013

E-RIDS= ADM -03

Add= J. Herrera (TXH1)