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Docket: NRC-2016-0158

Proposed Revision to NUREG-1556, Volume 21 - Program-Specific Guidance About Possession Licenses for Production of Radioactive Material Using an Accelerator

Comment On: NRC-2016-0158-0003

Program-Specific Guidance About Possession Licenses for Production of Radioactive Material Using an Accelerator; Extension of Comment Period

Document: NRC-2016-0158-DRAFT-0002

Comment on FR Doc # 2017-00907

Submitter Information

Name: David Reindl

11/17/2017
82FR 4925

General Comment

See attached file(s)

2

Attachments

Docket ID NRC-2016-0158 Wisconsin Comments

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RULES & REGULATIONS

SUNSI Review Complete

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Add= R. Mac Donald (rxm7)



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February 9, 2017

Cindy Bladey
Office of Administration
Mail Stop: OWFN-12-H08
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

RE: Docket ID NRC-2016-0158, comments on proposed draft NUREG-1556, Volume 21, Revision 1, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Possession Licenses for Production of Radioactive Material Using an Accelerator."

Dear Ms. Bladey,

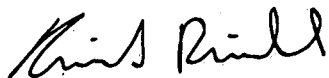
The State of Wisconsin, Radioactive Materials Program has reviewed the above document and submits the following comments:

1. Page 8-5, line 1: change "if it is known that specific high-risk, incidentally activated radionuclides are produced in smaller quantities" to "specific high-risk, incidentally activated radionuclides that are produced in smaller quantities..."
2. Page 8-5, lines 8-9: delete "and the total cumulative quantity for all radionuclides." If the nuclides will be line-itemed on the license, the summed activity is not necessary.
3. Page 8-6: Deletes lines 17-21. The sentence on lines 17-19 was already stated in Section 3.1. The sentence on lines 19-21 provides the same information as the sentence on lines 14-15.
4. Page 8-6, lines 36-38: The information in this Note is not consistent with the guidance on pages 8-4 and 8-5. The Note should highlight the detailed information that should be submitted for incidentally produced radionuclides with half-lives >120 days or in significantly larger quantities. Section 8.5.1 should also list examples of radionuclides (Co-57, Co-60, Zn-65, etc.) for each category.
5. Page 8-8, lines 24-26: Delete "Subsection (f) establishes the methods by which any financial assurance instrument, such as a prepayment, surety bond, insurance, or sinking

fund, must be provided.” This information is described in Figure 8-2 on the same page.

6. Page 8-9, lines 1-4. Delete this paragraph. It contains the same information as page 8-8 lines 6-10.
7. Page 8-15, line 11: Change “it is recommended that the RSO have” to “the RSO should have”.
8. Page 8-16, Figure 8-3: This figure was clearly designed for industrial radiography. Several of the icons in the figure do not relate to accelerator facilities, specifically the focus on “devices”. In addition, six-month worker audits are not required for accelerator facilities. Revise or delete this figure.
9. Page 8-16, line 4: change “may need” to “should have”.
10. Page 8-34, Figure 8-6. The 10 CFR 20.1003 definition for “total effective dose equivalent” no longer includes the phrase “deep dose equivalent”. Update the text directly above the caption.
11. Appendix H, page H-2; P-32 does not seem to be a good example for accelerator facilities.
12. Appendix J, page J-2: Several isotopes (e.g., I-131) are on the table twice, and the table is missing a horizontal line separating I-129 and Th-nat.
13. Appendix K: Please use the equation editor feature of your word processing program to input the leak test equations.
14. Appendix L: The contamination limits on page L-4 are not correct. In 2014, DOT raised the package contamination limits to 240 dpm/cm² for beta/gamma/low toxicity alpha and 24 dpm/cm² for all other alpha emitters.

Sincerely,



David Reindl
Nuclear Engineer
Radioactive Materials Program
State of Wisconsin