

Duran-Hernandez, Doris

Subject: FW: Docket ID NRC-2016-0158 - State of Washington Comment for DRAFT NuReg 1556 Volume 21 Revision 1
Attachments: State of Washington Comments for NuReg 1556 Volume 21 Revision 1 DRAFT -....docx

From: Halloran, Andrew M (DOH) [mailto:andrew.halloran@doh.wa.gov]
Sent: Friday, February 24, 2017 6:49 PM
To: Bladey, Cindy <Cindy.Bladey@nrc.gov>
Cc: Lawrence, Craig (DOH) <Craig.Lawrence@DOH.WA.GOV>; Fordham, Earl W (DOH) <Earl.Fordham@DOH.WA.GOV>
Subject: [External_Sender] Docket ID NRC-2016-0158 - State of Washington Comment for DRAFT NuReg 1556 Volume 21 Revision 1

Cindy,

Attached are the state of Washington comments following review of the draft document identified in the subject line. The state of Washington thanks you for this opportunity to comment. Please feel free to contact us with any questions.

Thank you,

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Template = ADM - 013
E-RIDS= ADM-03
Add= R. Mac Dugall (IXm7)

State of Washington Comment

Draft NuReg 1556, Volume 21, Rev 1: Program-Specific Guidance About Possession Licenses for Production of Radioactive Material Using an Accelerator

Please include Docket ID NRC-2016-0158 in the subject line of your comments.

Mail comments to: Cindy Bladey, Chief, Rules, Announcements, and Directives Branch (RADB), Division of Administrative Services, Office of Administration, Mail Stop: OWFN-12-H08, U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001.
Cindy.Bladey@nrc.gov.

For any questions about the material in this report, please contact: Robert MacDougall, Project Manager at 301 415-5175 or by e-mail at Robert.MacDougall@nrc.gov.

Comments

1. Pg. 8-4, lines 36-38 – Should this be explained as being necessary for determining if a decommissioning funding plan is required?
2. Pg. 8-5, line 1 – How is “high-risk” defined in regards to radionuclides? This could vary depending on whether internal or external exposure is the primary concern, i.e. gamma/x-ray vs. alpha emitters.
3. Pg. 8-5, line 35 – Why is this 1 millicurie and not 100 microcuries?
4. Pg. 8-5, line 45 – “Must” instead of “should”?
5. Pg. 8-9, lines 3-4 – “One of several” seems vague. Is this referring to the mechanisms covered in NUREG 1757, Volume 3?
6. Pg. 8-9, lines 22 – Why is a leaking source not considered the same as a spill?
7. Pg. 8-13, line 8 – Delete either “radiation safety officers” or “RSOs”.
8. Pg. 8-16, line 10 – An/any instead of the.
9. Pg. 8-17, lines 5-7 – Shouldn’t this be “required” and “must”, not “important” and “should”?
10. Pg. 8-23, lines 25-27 – Is there a more recent reference?
11. Pg. 8-28, lines 31, 34 – Must instead of should?

12. Section 8.11 – Why are removable/replaceable activated components from accelerators not mentioned in the waste section? They are a significant part of the waste stream.
13. Pg. B-1, item 5 – This note would be better if it suggested the types of items that contain these activation products, e.g. concrete, shielding, targets, etc.
14. Pg. B-11, Public Dose – Should the submitted information include estimated doses to the MEI from effluent streams?
15. Pg. B-11, Procedures – Why isn't submission of the procedures for review required?
16. Pg. C-1, lines 9-10 – Shouldn't training include all individuals who work with or transport radioactive materials as well?
17. Pg. E-2, line 4 – What requirements? To be RSO?
18. Pg. E-8, line 27 – “Decommissioning funding plan up-to-date?”
19. Pg. J-1, line 33 – I wouldn't consider P-32 low energy.
20. Pg. J-9, lines 39-40 – “...of long-lived radioactive material”
21. Pg. K-4 – For wipe test activity, it state 0.005 mCi when it should be μCi .