

**Duran-Hernandez, Doris**

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**Subject:** FW: Comments to NRC on NUREG 1556 Vol 21  
**Attachments:** 201703081338.pdf

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-----Original Message-----

From: Ribaudo, Cathy (NIH/OD/ORS) [E] [mailto:ribaudoc@ors.od.nih.gov]  
Sent: Wednesday, March 08, 2017 3:01 PM  
To: Bladey, Cindy <Cindy.Bladey@nrc.gov>  
Subject: [External\_Sender] Comments to NRC on NUREG 1556 Vol 21

Hi Cindy

Please find, attached, comments on behalf of the NIH regarding the draft NUREG-1556 Volume 21 document. Thank you for your consideration to include these in the committee's deliberation.

Best Regards,  
Cathy

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March 8, 2017

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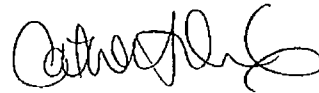
Dear Sir or Madam:

This is a submittal of comments on the draft of NUREG 1556, Volume 21, Revision 1 (Docket ID: NRC-2016-0158). We understand that this submittal will reach you after the February 24 deadline for comment submittal but we hope NRC will be able to consider the following comments on the draft revision.

- Section 8.7.1 (Radiation Safety Officer) has a new paragraph beginning at the bottom of page 8-14 describing the ability of the RSO to appoint an "Alternate RSO". On page 8-15, lines 5-9 notes that "Designees should have the same management support and decision-making authority as the RSO necessary to accomplish the tasks to which they have been assigned. Please note that only the primary RSO is named on an NRC license. Applicants do not have to identify other responsible individuals if day-to-day tasks will not be delegated."
  - Does this mean that any "Alternate RSOs" must also have a Delegation of Authority ensuring that decision-making authority has been conveyed?
  - Although any Alternate RSO designees would not be specifically named on the license, the language of the paragraph suggests that if day-to-day tasks will be delegated, the designees would need to be identified, presumably in license application documentation and a license amendment would need to be submitted anytime there was a change in who is designated or which tasks are delegated. Is this interpretation correct?
- Section 8.10.4 (Occupational Dose) has a paragraph on page 8-38 that discusses individuals who have been determined to have the potential dose exceeding 10% of the limits. Lines 10-11 state that in addition to the licensee being required to monitor those individuals, they must report to the individuals the results of that monitoring, even if the actual dose does not ultimately exceed 10% of the limit. This appears to contradict 10 CFR 19.13(b)(1) which states that reporting is only required if the dose exceeds 1 mSv (100 mrem).
- Table J-2 (Acceptable Surface Contamination Levels) has a number of changes from the current version in Table M-5. Notably, it removes the catch-all category of alpha emitters and instead lists several individual alpha-emitting nuclides, whose limits are not all the

same. There are definitely other alpha emitters (e.g. At-211) that are produced via cyclotrons. Thus, what would the limits be for an alpha emitter not in the revised table?

Again, we hope NRC is able to give our comments consideration. If you have any questions or need additional clarification on our submittal, please contact me at 301-594-1303 or via e-mail at [cribaudo@nih.gov](mailto:cribaudo@nih.gov).



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