

12/13/2017

Attn: Document Control Desk  
Director  
Office of Nuclear Material Safety and Safeguards  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001

Louisiana Energy Services, LLC  
NRC Docket No. 70-3103

Subject: UUSA Comments on Draft Regulatory Guide DG-8056, "Instructions for Recording and Reporting Occupational Radiation Dose Data" issued October 16, 2017  
(Docket No. ID NRC-2017-0205)

Reference: 82 Federal Register 48125 October 16, 2017

The Nuclear Regulatory Commission ("NRC") published the subject draft guide on October 16, 2017 requesting comments. In response, Louisiana Energy Services, LLC, dba URENCO USA (UUSA) submitted comments on 12/13/17. As allowed in the Reference, UUSA's comments in Enclosure 1 were submitted via the website <http://www.regulations.gov>.

UUSA appreciates this opportunity to comment on the subject guide. Should there be any questions related to this response, please contact Wyatt Padgett, UUSA Licensing and Performance Assessment Manager, at 575-394-5257.

Respectfully,



Stephen Cowne  
Chief Nuclear Officer and Compliance Manager

Enclosure: Comments submitted via regulations.gov

NM5520

LES-17-00153-NRC

cc:

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LES-17-00153-NRC

Enclosure 1  
Comments Submitted Via Regulations.gov

12/13/2017

**Subject:** UUSA Comments on Draft Regulatory Guide DG-8056, "Instructions for Recording and Reporting Occupational Radiation Dose Data" issued October 16, 2017 (Docket No. ID NRC-2017-0205)

On October 16, 2017, the Nuclear Regulatory Commission (NRC or Commission) published a Federal Register Notice, 82 *Fed. Reg.* 48125, dated October 16, 2017 (Notice), requesting public comment on the draft regulatory analysis DG-8056, "Instructions for Recording and Reporting Occupational Radiation Dose Data", prepared as part of its proposal to revise Regulatory Guide(RG) 8.7. UUSA hereby submits and requests the Commission's consideration of the following comments.

*Section 1.1 If Monitoring Is Not Required*

If the prospective dose evaluation shows that an individual is not likely to receive a dose in a year that exceeds the monitoring criteria set forth in 10 CFR 20.1502, the licensee is not required to monitor the individual's dose, to keep records, or report the individual's dose. If monitoring of the occupational intake of radioactive material and assessment of the CEDE is not being performed, then licensee evaluations of subsequent minor intakes that were anticipated based on the prospective dose evaluation or pre-job evaluations is not required monitoring. However, dose assessments performed to quantify unanticipated intakes or exposures are considered required monitoring, regardless of the magnitude of the resulting doses, and results must [be] recorded and reported accordingly.

Regarding the statement above, "However, dose assessments performed to quantify unanticipated intakes or exposures are considered required monitoring, regardless of the magnitude of the resulting doses, and results must recorded and reported accordingly," UUSA believes that minor doses should not be included up to a total of 10 mrem per year.

Our concern with the issue is on the definition of "unanticipated intakes". UUSA's protocol would include writing a dose evaluation for any urinalysis results  $>0.27\text{mg/L}$ , which equates to 0.50 mrem committed effective dose equivalent (CEDE). The conservatism from the draft RG lies in events where there would only be a fraction of a mrem, for instance 0.03 mrem CEDE. The RG states unanticipated intakes that are found during a routine bioassay would be recorded (recorded in this case as 0.03 mrem) and reported. UUSA finds it unreasonable to record and report an intake of less than 10 mrem.

UUSA appreciates the opportunity to comment on the subject Regulatory Guide. If you have any questions, please contact Wyatt Padgett, Licensing and Performance Assessment Manager, at 575-394-5257.

Respectfully,

A handwritten signature in black ink that reads "Stephen R. Cowne".

Stephen R. Cowne  
Chief Nuclear Officer and Head of Compliance