

PUBLIC SUBMISSION

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Guidance Document for Alternative Disposal Requests

Comment On: NRC-2017-0198-0001
Revision of the Guidance Document for alternative Disposal Requests

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Submitter Information

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General Comment

The guidance states: Dose assessments should consider transport of the material to the disposal facility and evaluate dose to members of the public, including transportation workers. This raises some concerns as it seems inconsistent that shipping under a 20.2002 request must include this assessment however, shipping wastes for disposal in a licensed facility in accordance with DOT regulations would not require such an assessment. This is further confusing in that it is very likely that the same transport company would be used for shipping to a facility whether the facility is licensed or not. Recommend the dose to transport workers from the licensee facility to the disposal facility be excluded from the assessment, but licensees rather should explain how they are complying with DOT regulations during transport.

SUNSI Review Complete
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