

# PUBLIC SUBMISSION

**As of:** 12/19/17 11:14 AM  
**Received:** December 18, 2017  
**Status:** Pending\_Post  
**Tracking No.** 1k1-90fe-lj3r  
**Comments Due:** December 18, 2017  
**Submission Type:** Web

**Docket:** NRC-2017-0198  
 Guidance Document for Alternative Disposal Requests

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

**Document:** NRC-2017-0198-DRAFT-0010  
 Comment on FR Doc # N/A

10/19/2017  
 & FR # 8727

## Submitter Information

9

**Name:** Anonymous Anonymous

## General Comment

Section 7.1.2 discusses offsite disposal; the dose assessment criteria is stated as 5 mrem/yr with some exceptions. My experience is that at the RCRA-c facilities currently accepting radioactive wastes the workers are trained as radiation workers, monitored for exposure using 29 CFR 1910.1096 standards. They also use 10 CFR as a reference to set up their radiation protection programs. As such they are the equivalent of a licensee's rad workers. Given this should they could be considered as radiation workers and their dose should not be limited to 5 mrem/year. Workers such as internal facility transporters such as truck drivers transporting wastes from a rail transfer facility to the landfill may be sub contract personnel and not monitored thus their dose could be limited to the 5 mrem/yr. Accordingly it is likely that these truckers may be exposed to multiple alternate disposals so limiting their dose to 5 mrem/yr seems prudent. The basement intruder scenario should also be excluded from consideration when a facility has covenants or permit conditions restricting future use of the property in perpetuity such as a TSCA permit which prohibits future residential lands use forever.

**SUNSI Review Complete**  
**Template = ADM - 013**  
**E-RIDS= ADM-03**  
**Add= R.L. Glosney (R299)**