

# PUBLIC SUBMISSION

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**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

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## Submitter Information

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## General Comment

Section 7.2.1 states: "The potential for the same individual to be involved in concurrent scenarios is physically constrained by the relatively limited amount of materials that could be released from licensed facilities, geographical distances between licensees, and the different locations where scenarios could occur." which seems to be contradicted by section 10.2 which states: "The preliminary criteria listed in SECY-06-0056, Enclosure 3, indicated that a request would not be considered significant and no special measures would be necessary when: The proposed 20.2002 disposal will be in a facility that routinely disposes of large quantities of similar radioactive materials, in accordance with its permit; ....." . It is recommended that NRC reconcile the differences in the assumptions for concepts of dose assessment limits and communication requirements.

**SUNSI Review Complete**

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