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General Comment

Thank you for the opportunity to comment on the Draft Guidance for the Reviews of Proposed Disposal Procedures and Transfers of Radioactive Material Under 10 CFR 20.2002 and 10 CFR 40.13(a), Revision 0.1 (NRC-2017-0198). I have concerns about apparent contradictions in recommendations for on-site and off-site disposal, respectively.

I fully support recommendations regarding consideration of radon and the compliance period identified for on-site disposal facilities licensed by the NRC. On Page 16 of the guidance, it is stated that "...the analyst does not need to consider potential dose from radon..." and "...on-site disposal analyses should be calculated to a peak dose within 1,000 years..."

However, on Page 17, in the context of off-site disposal, the guidance refers to draft NUREG-2175, which includes a 10,000 year compliance period rather than the 1,000 time frame identified for on-site disposal. Also on page 17, it is stated that "Radon from source, byproduct or special nuclear material should be considered, for off-site disposal" which directly contradicts the recommendation for on-site disposal on Page 16.

The recommendations for on-site disposal including the use of a 1,000 year compliance period and excluding radon and progeny from all pathways dose are consistent with the requirements in DOE Manual 435.1-1, 10 CFR Part 20, and 10 CFR Part 40. A 1,000 year compliance period is also consistent with the Commission's recent direction (SECY-16-0106/RIN 3150-AI92). The recommendations for off-site disposal contradict the recommendations for on-site disposal and are inconsistent with the Commission's direction and implementing regulations identified in the title of the guidance.

I suggest that the guidance for off-site disposals be updated to be consistent with the guidance for on-site

disposals and with the Commission's direction, 10 CFR Part 20, 10 CFR Part 40 and DOE Manual 435.1-1.

Sincerely,
Roger Seitz