

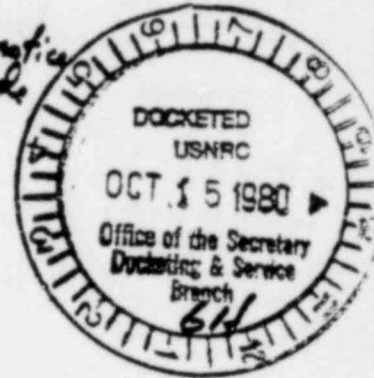


**KERR-MCGEE CORPORATION**

KERR-MCGEE CENTER • OKLAHOMA CITY, OKLAHOMA 73125

WORK NUMBER  
PROPOSED DIME

PR *misc notice*  
*Reg Guide*



October 8, 1980

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Secretary of the Commission  
U.S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Dear Sir:

The American Mining Congress, Uranium Environmental Subcommittee presents the following comments on the draft Reg. Guide titled, "Health Physics Surveys in Uranium Mills", Task OH 710-4.

Comment No. 1

On page 4 it states, "An acceptable sampling program for airborne uranium ore dust includes monthly grab samples of 60 minutes duration in worker occupied areas in which ore is actively handled". This applies to areas which do not need to be designated as airborne radioactivity areas. We believe weekly high volume samples collected for five minute periods are preferable.

Comment NO. 2

On page 9 it states, "In addition to gamma surveys, beta surveys should be made every two years to estimate extremity and skin exposure for workers who work for long periods in close proximity to yellowcake". We believe a single study in this regard, that is beta exposure to the skin of the worker, could be a single occurrence and need not be repeated annually.

Comment No. 3

On page 11, it is stated, "The area should be promptly cleaned if surface contamination levels exceeds 25% of the values in Table 1". We believe Table 1 should indicate the limits intended, not a percentage of another table. Table 1 then should be used exclusively for the Article 1.7 as found on page 12, which states, "Surface contamination levels listed in Table 1 are acceptable to the licensing staff for surveys of equipment prior to release to unrestricted areas".

Acknowledged by card... *10/15/80*

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*10/11*

Comment No. 4

On page 13, Section 1.8, "Survey of Packages Prepared for Shipment", it is stated that, "Packages having contamination should be cleaned until the packages meet Department of Transportation requirements for non-exclusive use vehicles". When exclusive use vehicles or sole use vehicles are used, this requirement does not apply. We suggest that prior to shipment, yellowcake drums be cleaned of any visible quantities of yellowcake when sole use vehicles are used.

Comment No. 5

On page 13, Item 2, Intake and Exposure Calculations, a formula is given for determining quantity intake of uranium in either micrograms or microcuries. We would prefer the familiar use of the MPC-hour to designate exposure to airborne radioactivity particulates.

Comment No. 6

On page 14 is a discussion of time studies made of workers activities delimiting a minimum study frequency of three months. We believe that time studies on an annual basis are adequate for the routine situation. Whenever process changes or procedure changes are implemented, additional time studies should be made.

Comment No. 7

In Section 3, Reports of Overexposure to Airborne Materials, on page 16, is a discussion of uranium ore dust and yellowcake in which the maximum permitted intake are given in terms of micrograms or microcuries. We would prefer to see this in terms of MPC-hours.

Comment No. 8

In regard to the combining of exposures as found in Item 4 on page 15, we really have no problem with the combining of exposure of yellowcake and ore dust assuming these both affect the kidney in a like manner. We do, however, have a problem with combining radon daughter exposure to the lung with the exposures to the kidney from ore dust and yellowcake as found in Subsection 5 of Part 3 on pages 15 and 16. The rem (or uranium chemical toxicity) to the kidney is not additive to the rem (or working levels) to the lung from radon daughters.

Comment No. 9

On page 16, Article 4.1, we again find exposures given in terms of micrograms instead of MPC-hours.

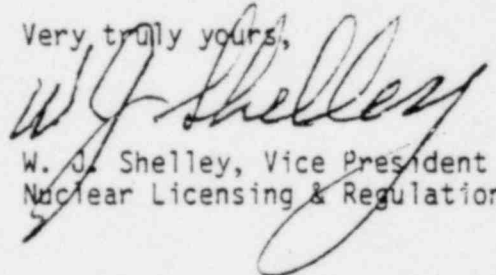
Comment No. 10

As found in Section 4.2 (also on page 16), is a paragraph titled, "Administrative Action Levels". This section refers to the "as low as reasonably achievable criteria for action levels". Another Reg. Guide, No. OH 941-4 in the draft stage implies action levels at the equivalent of 10% of MPC. Historically, the action levels of the industry have been generally set at values of 50-75% of MPC. The achievement of 10% MPC in an operation for one mill may be quite reasonable, while in another mill, it may be very difficult and even unreasonable to achieve. ALARA is thusly site specific to the various mills and to their process. Assigning a value to ALARA is the responsibility of each licensee, individually, and need not be quantified in a regulatory rule or guide.

Comment No. 11

Section 8 discusses workers' clothing. The first sentence states, "Workers working in airborne radioactivity areas should be provided with protective clothing---". The rest of the section deals exclusively with yellowcake handling areas and we feel that the first sentence should more clearly state the same. Further, additional clarification is suggested for the first sentence, as follows: "Workers working with yellowcake in airborne radioactivity areas, as defined in 20.203(d), should be provided with protective clothing such as coveralls and shoes or shoe covers.

Very truly yours,



W. J. Shelley, Vice President  
Nuclear Licensing & Regulation