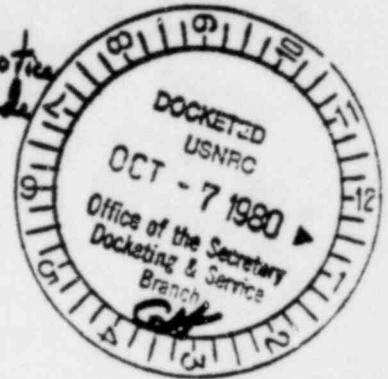


DOCKET NUMBER
PROPOSED RULE

*PR misc notice
Reg Guide*

ROCKY MOUNTAIN ENERGY COMPANY



ENVIRONMENTAL SERVICES
CLARK M. BALSER
MANAGER

September 30, 1980

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

Attn: Docketing and Service Branch

Re: Task OH 941-4
"Information Relevant to Ensuring
That Occupational Radiation Exposures
at Uranium Mills Will be ALARA"

The following are comments concerning the above cited draft regulatory guide.

1.3 Mill Workers

"All workers at the mill should be responsible for the following: 1) adhering to all rules, notices, and operating procedures for radiation safety established by licensee management and the RSO";

It is agreed that the above is a necessary and integral part of the individual worker's responsibility for his or her position. It is believed, however, that a stronger statement must be made concerning individual worker responsibility for actions which deliberately violate radiation safety programs. Industry wholeheartedly endorses firm delineation and fixed responsibility of the uranium mill operator to afford adequate protection for all involved in the operation. Industry can not, however, accept efforts to protect individuals from the consequences of their own irresponsible, self-destructive behavior, either willful or negligent.

2.8 Bioassay Procedures

"...The frequency adopted and the ~~type~~ of analysis should meet the recommendations in Regulatory Guide 8.22."

It is believed that since Regulatory Guide 8.22 has not been finalized, it is inappropriate to reference this guide as if it is final. It is suggested, therefore, that wording can be added to the above cited sentence which would allow a licensee

ACKNOWLEDGED by card. *[Signature]*

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coming up for renewal, for example, to implement the program proposed in response to 8.22. Such wording may be as follows. "...The Bioassay program should be patterned after the format of Regulatory Guide 8.22 with the specific frequency adopted and the type of analysis being proposed by the RSO according to individual site specific considerations e.g. presence of a yellow cake dryer, and commercial analytical lab turn around times, etc."

3.3 Ventilation System

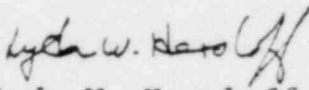
To the extent practicable, accomplish the following.
1) "...maintain airborne concentrations of natural uranium to less than 10% of the maximum permissible concentration (MPC) given in Table 1 of Appendix B to 10 CFR 20."

By setting a limit of 10% of MPC_a , the concept of ALARA is violated since a quantifiable limit can not be a philosophy. The value of 10% MPC_a , equal to 1×10^{-11} $\mu\text{Ci/ml}$ U_{nat} , therefore, becomes the MPC_a , a level which may or may not be as low as reasonably achievable. Furthermore, there is given no justification to reduce the standards as given in 10 CFR 20.103 or 10 CFR 20.203(d)(1)(ii).

At the least, it is suggested that the word "average" be inserted so that the sentence reads "...maintain average airborne concentrations of natural uranium to less than 10% of the maximum permissible concentration (MPC) given in Table 1 of Appendix B to 10 CFR Part 20."

4. Control of Airborne Uranium and Its Daughters

It appears that this whole section may be superfluous since in Section 3.3 an ALARA standard of 10% or MPC_a has already been recommended. Given this statement, even though it is believed that there is no justification for this standard, how the "recommendation" is met should be left to the discretion of the individual companies. Wording such as "all drop points should have either hooded dust collectors or...foam ejectors" (emphasis added) only serves to further reduce the companies' control over their own operations and to further quantify ALARA on the basis of what costs are thought to be reasonable.


Lyda W. Hersloff
Environmental Specialist

cc: C. M. Bolser
J. A. Yellich
G. Chase
P. Spieles