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HPS-81-279



Office of Nuclear Reactor Regulation
USNRC
Washington, D.C. 20555

Attention: Leader, Radiation Protection Section

Subject: Comments on NUREG-0761

NUS Corporation has reviewed proposed NUREG-0761 and has the following comments and suggestions:

1. Section 5.a.(14) (page 21): There is no Section 12. We assume you mean Section 11.
2. Section 5.b.(14) (page 25): Same comment as #1.
3. Section 5.b.(9) (page 23-24): The requirement for calculating skin dose from skin contamination should only be required if the skin dose to 1 cm^2 of skin will exceed some specified dose such as 5 mrad. It would be preferable to specify that such dose calculations be required only when the contamination level ($\text{dpm}/100\text{cm}^2$) exceeds a specified level. Licensees should not be required to make such calculations for every skin contamination case.
4. Section 6.b.(1).b.v. (page 30): If Radioactive Material is stored in an area, the area is not uncontrolled.
5. Section 6.c.(d) (page 31): A periodic inventory should be required only for sealed sources (as covered in subsection (i)). A requirement for an inventory of all Radioactive Material stored in a plant would be very cumbersome and time taking, without producing an equivalent benefit. It is suggested that in place of requiring a periodic inventory, that the plan require a periodic inspection of radioactive material storage areas. The inspection should include verification of container integrity and a survey of radiation and contamination levels in the storage area, but not an item-by-item inventory.
6. Section 7.c.(1).(a) (page 34): The requirement to sample potable water supplies at least weekly is too frequent. In most plants drinking water is supplied from normal municipal water supplies. Potable water supplies should be sampled no more frequently than monthly, and preferably, quarterly. The plan should logically include a provision to smear controlled area drinking fountains on a weekly basis to assure they have not become contaminated.
7. Section 7.c.(3).(b) (page 35): The requirement to survey clean waste dumps and landfills should only apply to onsite facilities. If the clean waste dump or landfill is offsite, routine surveys will create serious political and public relations problems.

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8. Section 8.b.(2).(b) (page 39): The requirement for daily operational (functional) checks of continuously operating instruments should be changed to "at least twice per week" to give facilities better operating flexibility.
9. Section 8.c.(3).(b) (page 40): The requirement for daily operational (functional) checks for portable dose rate instruments should be changed to "daily for those instruments being used on that day". There should be no requirement to run daily functional checks on instruments that may not be used for many days or weeks. This is also consistent with the acceptance criteria of Section 8.b.(3).(b).
10. Reference Section 8 (page 47): Suggest ANSI N-323-1978 be added. It is included as an acceptance criteria in Section 8.
11. Appendix A, A.2.(c) (page 49): Since 1000 dpm is generally considered clean, we suggest you use greater than (>) symbol rather than less than (<) symbol in this section.
12. Appendix E, Section B.1 (page 64): Include the following surveys in the list, since they are frequently omitted from training, and are frequently performed incorrectly:
 1. Surface beta surveys
 2. Beta surveys at distances other than surface
 3. Surface gamma surveys
 4. Difference between surface and contact surveys
13. Appendix E, Section B.3.b.(5) (page 65): Why so much emphasis on filter removal jobs? They are infrequently done. Other jobs such as work on valves have equal potential for spread of contamination. We suggest item be reworded to be: "Controls and monitoring required for process system line breaks and equipment opening."
14. Appendix E, Section B.4.f (page 67): This item should be rephrased to make it clear that the "controls" mentioned are "radiological controls", and not the "operating controls" for the compactor.
15. Appendix E, Section B.6.d (page 68): Waste sampling is normally done by Chemistry personnel, not Radiation Protection personnel. In some plants, the same technician has responsibilities for both chemistry and radiation protection. This item (particularly the demonstration) should be deleted or be made applicable only if the Radiation Protection group also performs chemistry. Preferably, it should be part of the chemistry training.
16. Appendix E, Section B.6.f (page 68): Same comment as comment #13 above.

Yours truly,



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