

American Iron and Steel Institute

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(59FR 5132)

OFFICE OF SECRETARY
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April 4, 1994

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

Attention: Docketing and Service Branch

Re: Comments of American Iron and Steel Institute (AISI) on NRC's Proposed
Amendment for Radiation Protection Requirements; 10 CFR Parts 19 and 20,
59 Fed. Reg. 5132 et seq. RIN 3150-AE80-1

Dear Madam or Sir:

American Iron and Steel Institute (AISI) is a voluntary not-for-profit trade association that represents 35 domestic member companies that produced approximately 70% of the U. S. raw steel and employed 125,000 people in their iron and steel operations in 1993. As both users of industrial gauges containing radioactive material in sealed sources, its member companies are subject to the radiation protection requirements.

We are pleased that NRC is interested in improving and clarifying the intent of these standards and reducing uncertainty among licensees regarding how to implement these standards. Our member companies' experience with the standard suggest that there is a need for improvement.

The proposed change to 19.12 (a) supposedly would make it clear that anyone in the course of their employment in which the individual's assigned duties involve the potential for exposure to radiation and/or radioactive material must be provided appropriate radiation protection training.

Steelmaking facilities utilize numerous industrial gauging devices containing radioactive material in sealed sources to control processes, determine fluid level in pipes and vessels, measure product and coating thicknesses, measure moisture content and density, etc. These gauges are typically designed with appropriate shielding to maintain radiation levels at or below 0.002 rem per hour at a distance of



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three (3) feet. These devices are typically located in areas where members of the public and our employees would not have access. Although these devices are shielded and located in inaccessible areas, all employees working in a steelmaking facility may have potential for exposure to some amount of radiation while performing assigned duties, however, it would not be likely.

We do not believe it is the NRC's intent for employers to train all employees regardless of how unlikely radiation exposure would be. Therefore, to provide additional clarification, we recommend the following language.

19.12(a) All individuals who in the course of employment in which the individual's assigned duties involve exposure to radiation and/or to radioactive materials and who are likely to receive, in 1 year, a dose greater than 1 mSv (100 mrem) shall be -

In 20.1802, control of material not in storage, states the licensee shall control and maintain constant surveillance (emphasis added) of licensed material that is in an unrestricted area and that is not in storage.

It is recommended this language be modified as follows:

The licensee shall control or otherwise secure from unauthorized removal or access of licensed material that is in an unrestricted area and not in storage.

Clarification is needed regarding the definition for Member of the Public and 20.1301(b) Dose limits for individual members of the public.

It is recommended this language be modified as follows:

20.1301(b) states, "if the licensee permits members of the public to have access to restricted areas, the limits for members of the public continue to apply to those individuals."

If the licensee permits members of the public to have access to restricted areas, the limits for members of the public continue to apply to those individuals except when that individual is receiving an occupational dose.

Finally, we believe the requirements for users of industrial gauges to keep track of exposures to members of the public while frequenting unrestricted areas provides undue hardship, is impractical and unnecessary.

Users of industrial gauging devices should be required only to insure the dose in any unrestricted area from external sources does not exceed 0.002 rem per hour, advise members of the public of the presence of a gauge and control access to restricted areas.

Sincerely,

A handwritten signature in cursive script, appearing to read "P. A. Hernandez".

P. A. Hernandez