

May 23, 1994

MEMORANDUM FOR: Joel Lubenau
Technical Assistant
to Commissioner de Planque

FROM: James L. Blaha
Assistant for Operations
Office of the Executive Director
for Operations

SUBJECT: DRAFT MANUSCRIPT

This responds to your April 14, 1994, memorandum requesting staff review and comment on a draft manuscript entitled "Radioactive Materials in Recycled Metals." Also, enclosed is a list of several specific comments on the manuscript for your use. Our general comments are: 1) the robust conclusion does not appear to be justified by the paper, since the radiation risk is weighted with foreign incidents and several exposures to members of the general public, not metal recycling personnel; 2) there is a need to address, in more detail, the numerous incidents involving naturally-occurring radioactive material, since they are discovered twice as frequently as byproduct material.

J. Turdici

cc: PTing, OCM/IS
SCoplan, OCM/KR
RBoyle, OCM/FR
SECY OGC
Enclosure: As stated

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PDR COMMS NRCC
CORRESPONDENCE PDR

for

James L. Blaha
Assistant for Operations
Office of the Executive Director
for Operations

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EKraus reviewed 5/13/94 *See previous concurrence

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DATE	5/16/94		5/16/94	5/16/94	5/18/94
OFC	DD:IMNS		D:NMSS	EDO	EDO
NAME	GArlotto		RBernero	JBlaha	JTaylor
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- ° Page 1, first paragraph - suggest using current estimates, if available.
- ° Page 1, second paragraph - in the discussion of serious radiation exposures, they should be identified as foreign experience.
- ° Page 3, first paragraph - suggest you add, as an example, precious metals (i.e. radium in gold jewelry).
- ° Page 3, - radiation risks - suggest you place some boundaries on the source activities. You appear to discuss the risk for a Cesium gauge in the same way you discuss the foreign incident having several curies of Cesium-137. Also many gauge sources are ceramic mixture and were not as dispersible as Cesium chloride as in the foreign incident. Suggest you discuss incidents that have occurred at smelting operations and the associated risks. That would be more relevant to the subject of the paper.
- ° Page 4 - cost in the industry -- we question the validity of extrapolating the Auburn Steel expense, given that your past paper had lower estimated costs for several incidents.
- ° Page 4, "Other Discoveries" - should discuss NORM material and radiation exposures as a result of these findings.

Suggest you modify the statement about no national requirements for reporting, to strengthen your argument. There currently is no central place to get records. You might also want to explain that State and NRC reporting regulations do not apply to non-licensees like scrap dealers etc.
- ° Page 7 - last full paragraph "Annually 5 to 10 reported..." This seems to contradict information provided to support the Chairman's speech of 10 reported loses per year.
- ° Page 10, first paragraph - the proposed rulemaking would not have required registration, only responses to NRC question on inventory and locations of devices they possess.
- ° Page 10, second paragraph - suggest you reevaluate this paragraph. In the recent case in Pennsylvania DOT firmly stated that the exemption only applied to the entire load and not to isolated sources found in scrap.