



WM DOCKET CONTROL

Texas Department of Health

Robert Bernstein, M.D., F.A.C.P.
Commissioner

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October 27, 1986

Radiation Control
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OFFICE
DOCKETING &
BRANCH

Malcolm R. Knapp, Chief
Low-Level Waste and Uranium Recovery
Projects Branch
Division of Waste Management
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

WM Record File

207.6

WM Project

Docket No.

PDR

LPDR

Distribution:

MRK
R-15
(Return to WM, 623-SS)

Dragonette

Dear Mr. Knapp:

Thank you for the opportunity to comment on the Nuclear Regulatory Commission's (NRC) Policy Statement on Radioactive Waste Below Regulatory Concern. Staff of the Bureau of Radiation Control have reviewed the document and offer the following comment:

Since the U. S. Environmental Protection Agency (EPA) has looked at many waste streams in order to establish a limit for "below regulatory concern", they have determined that waste streams causing less than one millirem dose per year to a population would result in less than one health effect in 10,000. At this dose level, approximately 28 percent of current waste streams could go to an ordinary landfill. The NRC should coordinate its efforts with EPA to develop a usable rule in this area.

The Bureau of Radiation Control has drafted rules which would allow certain concentrations of short-lived radionuclides to be disposed in sanitary landfills. The rules are based on a study and modeling that limited doses to the most exposed individuals to one millirem per year. Proposal of the rule for public comment is expected to occur in the next two months. We encourage the NRC to pursue similar rulemaking activities.

If you have any questions concerning this matter, please contact us.

Yours Truly,

David K. Lacker
David K. Lacker, Chief
Bureau of Radiation Control

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