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98

From: <jbmartin@usit.net>
To: TWFN_DO.twf4_po(CAG)
Date: Mon, Nov 29, 1999 3:11 PM
Subject: NRC RuleForum Form Submission: Rulemaking on Release of Solid Materials at Licensed Facilities

Who: Jerome B. Martin
Organization: Individual Comment
Email: jbmartin@usit.net
Re: Rulemaking on Release of Solid Materials at Licensed Facilities
Comments:

I believe that NRC should adopt or reference the new ANSI standard N13.12, "Surface and Volume Radioactivity Standards for Clearance" in its rulemaking on Release of Solid Materials at Licensed Facilities. The provisions of ANSI N13.12 clearly apply to the needs of NRC for a revised rule on release of contaminated or potentially contaminated solid materials. The standard is a consensus standard that has input from NRC, its licensees, and the public. The standard has a strong, defensible technical bases that provides an adequate margin of safety to workers and the public. An NRC rule that incorporates ANSI N13.12 would also be consistent with international standards that govern release of solid materials.

PDR PR 20 64FR35090

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