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Comment On: NRC-2011-0266-0001
Draft Interim Staff Guidance: Evaluations of Uranium Recovery Facility Surveys of Radon and Radon Progeny in Air and Demonstrations of Compliance

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RULES/REGULATIONS

General Comment

See attached file(s)

Attachments

NRC-2011-0266-uranium-recovery-radon-public-comment-porterfield-2012jan04

SUNSI Review Complete
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Cell = J. Schmidt (dax2)

January 4, 2012

U.S. Nuclear Regulatory Commission
Draft Interim Staff Guidance: Evaluations of Uranium Recovery Facility Surveys of Radon and
Radon Progeny in Air and Demonstrations of Compliance
Docket number NRC-2011-0266

Dear Ms. Bladey,

The following comments are in response to the November 21, 2011 Federal Register notification (Vol. 76, No. 224, p. 72006-72007) inviting public comment on the draft interim staff guidance document titled "Evaluations of Uranium Recovery Facility Surveys of Radon and Radon Progeny in Air and Demonstrations of Compliance with 10 CFR 20.1301", September 2011.

Comment 1

I'm disappointed that this draft guidance document didn't advocate usage of the "Multi-Agency Radiological Laboratory Analytical Protocols Manual" (MARLAP / NUREG-1576) of which the NRC was a contributor. I believe the systematic processes contained in MARLAP could benefit the conduct and evaluation of radon and radon progeny surveys.

Comment 2

Given the presence of a radon-222 with progeny background I would expect a significant challenge in differentiating the possible contribution of a 0.1 pCi/L (radon-22 with progeny) from licensee activities given the various applicable uncertainties. Therefore the application of an equilibrium factor less than 1.0 makes practical sense in better differentiating possible contribution from licensee activities.

Comment 3

I'm disappointed that there is not a greater body of voluntary consensus standards, e.g. ASTM International, cited in this document regarding the measuring of radon in air. Many such standards are dropping off the books of organizations such as ASTM given minimal participation and support of relevant US federal agencies. Instead standard organizations such as ISO are stepping in to issue new standards on radon measurements. These new standards will be primarily written to address the needs of the European Union and not U.S. federal agencies.

In closing I would like to express my appreciation for the staff of the Nuclear Regulatory Commission for re-visiting the manner in which the review of radon surveys is conducted.

Sincerely yours

Mr. Donovan Porterfield
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