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STATE OF WASHINGTON
DEPARTMENT OF HEALTH
OFFICE OF RADIATION PROTECTION

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July 26, 2006

Chief, Rules and Directives Branch
Mail Stop T-6-D59
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Review of the Standard Review Plan for Non-High Level Waste Determination for DOE Waste

The Washington State Department of Health (DOH) performed a review of NUREG 1854: *Standard Review Plan for Activities Related to U.S. Department of Energy Waste Determinations*. DOH found the document to be very thorough and comprehensive in extent and only offers the following comments:

- Section 3.3. An important aspect of the removal of highly radioactive material when the removal process may be ongoing during the review submittal is verification. It would be incumbent on DOE to submit finalized measurements or analytical data that support the assumed final removal fraction. This should be explicitly stated in this section as well as in Section 10.
- Section 3.3.2. Improvements in technology after determination submittal. Recommend removing the potential inclusion of technology improvements after submittal, as this could significantly delay the removal process and cost time and money in the process. Assuming that DOE has performed an adequate job in determining the appropriate technology (and this should be shown), then it is unrealistic to expect that over perhaps a five-year span a new technology or method would be introduced that would offer a measurable improvement, yet not increase the uncertainty of the total removal fraction.
- 10 CFR 61.41 specifies the dose limit to "any member of the public." NUREG 1854 should provide additional guidance for either deterministic or probabilistic guidance as to the desired endpoint and confidence bounds for analysis. For example, in some instances a critical subgroup is the most likely exposure endpoint. The generally accepted endpoint for this critical group is the average member of the critical group. For the general population, however, the generally accepted endpoint is the maximally exposed individual taken as the upper 95th percentile. These data endpoints, or others, should be specified in the document.

SONSI Review Complete
Template = ADM-013

E-RIDS = ADM-03
Call = A. Bradford (AT&T)



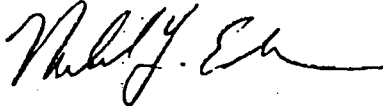
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DOH would like to offer their assistance in the review of determinations related to the Hanford Site. DOH has extensive experience in all aspects of pathway analysis and review as specified in NUREG 1854, and is very familiar with the supporting DOE documents for the Hanford Site that would aid in the review.

If you should have any questions, please do not hesitate to contact Drew Thatcher at thatcher.drew@comcast.net or me at 360.236.3241.

Sincerely,



Mikel J. Elsen, Supervisor
Waste Management Section