{In Archive} Fw: DRAFT for Review: ARAR Dose Compliance Concentrations for Radionuclides in Buildings (SDCC) electronic calculator

John Nebelsick to: Stuart Walker 02/20/2008 05:11 PM

From: John Nebelsick/DC/USEPA/US
To: Stuart Walker/DC/USEPA/US@EPA

History: This message has been forwarded.
Archive: This message is being viewed in an archive.

Stuart,

USACE HP comments on the draft BDCC calculator.

Thanks,

John Nebelsick
Analytical Services Branch
402-697-2572 (Omaha)
703-603-8845 (D.C.)
----- Forwarded by John Nebelsick/DC/USEPA/US on 02/20/2008 05:09 PM -----

"Clements, Julie A HNC@NWO" <Julie.A.Clements@usace.army.mil>
02/20/2008 04:58 PM

To John Nebelsick/DC/USEPA/US@EPA
cc
Subject RE: DRAFT for Review: ARAR Dose Compliance Concentrations for Radionuclides in Buildings (SDCC) electronic calculator

John -

Attached are my comments on the BDCC calculator. Not a ton of comments but, then again, then is very similar to the BPRG calculator. Please let me know if you have any questions/concerns.

Julie

-----Original Message-----
From: Nebelsick.John@epamail.epa.gov [mailto:Nebelsick.John@epamail.epa.gov]
Sent: Monday, January 28, 2008 10:36 AM
To: Clements, Julie A HNC@NWO; Hearty, Brian P HNC@NWO
Subject: Fw: DRAFT for Review: ARAR Dose Compliance Concentrations for Radionuclides in Buildings (SDCC) electronic calculator

Thanks for taking a look at this calculator. If you could provide comments within the next three weeks, that would be appreciated.

John Nebelsick
Analytical Services Branch
402-697-2572 (Omaha)
703-603-8845 (D.C.)
----- Forwarded by John Nebelsick/DC/USEPA/US on 01/28/2008 10:30 AM -----

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HTRW Center of Expertise - Review Comments

Reviewer Name:	Clements, Julie A.
Discipline	Health Physics
CX Project Review No.	
Date:	3/12/2015
Project Location	USEPA
Document Name:	ARAR Dose Compliance Concentrations for Radionuclides in Buildings

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GENERAL COMMENTS

Comment #1: Page 3 of 3, Introduction – Units for the BDCC may be pCi/cm2, pCi/m3, or pCi/g. Therefore suggest changing the second to the last sentence in this section to read " . . . presents BDCCs in both activity per area and activity per volume units."

Comment #2: It is this reviewer's experience that floors and lower walls of buildings have a much greater potential for contamination than upper walls and ceilings. Yet this calculator, like the BPRG calculator, assumes that the floor, walls, and ceiling are all equally contaminated. Has an evaluation been done to determine if this assumption significantly impacts the outcome? Would an impact only be significant for low photon energies (as is the case with receptor position in the room)? If answers to these questions are known, suggest discussing this in Section 4.3.10.

COMMENTS ON USER'S GUIDE

Comment #3: The absence of the NRC's License Termination Rule (LTR) (10 CFR 20, Subpart E) is noticeably absent from the ARAR discussion in the Introduction. It is understood that the discussion is not intended to include all possible dose based ARARs. However, the LTR is the dose-based ARAR which is probably used *most often* in CERCLA cleanups. It, therefore, would seem to warrant inclusion in the User's Guide. Additionally, recommend providing a regulatory reference for the "10 mrem/year standard".

Comment #4: Section 2.2.2 – As stated, the NRC will grant its licensees an exemption to use ICRP 68 DCFs. However, on June 8, 2007, the DOE published its updated "Occupational Radiation Protection Rule" in the Federal Register. Its standards for worker protection (the ALI for inhalation/ingestion and the DAC) are now based on ICRP 68 dose coefficients (exemption requests are assumed by this reviewer to be no longer needed).

Comment #5: Clarify for the reader the difference between open circles and filled-in circles on the stem-and-leaf CSM figure in Section 3.1 (quantified vs not quantified). This may not be obvious to all.