

STATE OF ILLINOIS
DEPARTMENT OF NUCLEAR SAFETY

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George H. Ryan
Governor

Thomas W. Ortziger
Director

April 5, 2001

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Paul H. Lohaus, Director
Office of State and Tribal Programs
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Re: Request for Comment on Materials Performance Goals and Measures SRM
(STP-01-012)

Dear Mr. Lohaus:

The Illinois Department of Nuclear Safety (Department) hereby submits its response to the above-identified Agreement States letter. The letter requests assistance and input on the current set of national-level strategic and performance goals to determine whether modifications are warranted and whether separate subgoals should be included for those licensees regulated by NRC and those regulated by Agreement States. The Department's comments follow:

1. The third top-tiered strategic measure states, "No events resulting in releases of radioactive material from civilian uses of source, byproduct, or special nuclear materials that cause an adverse impact on the environment." An "adverse impact on the environment" is a very broad term that is subject to a wide variety of interpretations. Clarification on what constitutes an "adverse impact on the environment" would help preclude very minor events from being included in performance monitoring.
2. We are committed to the National Materials Program approach; therefore, there should not be separate subgoals for licensees regulated by NRC and those regulated by Agreement States. Adequacy and compatibility is ensured through the Integrated Materials Performance Evaluation Program (IMPEP) and distinctions between NRC and Agreement States are not warranted.

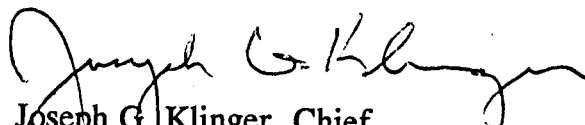


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3. The numerical goals should be readjusted to include all NRC and Agreement State licensee experience, and after all of the Agreement State responses to STP-00-081 are entered into NRC's Nuclear Material Events Database.

Thank you for the opportunity to comment. Please contact me at (217) 785-9930 if you have any questions.

Sincerely,



Joseph G. Klinger, Chief
Division of Radioactive Materials

JGK:kjg

cc: Jim Lynch, State Agreements Officer