

From: George Powers
To: 'Doehnert.Mark@epamail.epa.gov'; Doremus, Steven; Melinda Malloy; Petullo.Colleen@epamail.epa.gov; Robert Meck; Stephen Klementowicz; W.Mike Ripley
Date: 7/19/01 1:32PM
Subject: RE: Fwd: Impacted and Non-Impacted Definitions

We (Meck & Powers) also concur with Mark's description and have forward it, to the appropriate staff.

George E. Powers
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>>> "Doremus, Steven" <doremussw@raso.navy.mil> 07/19/01 09:01AM >>>
Colleagues,

I concur with Mark's reasoning.

CDR Steven W. Doremus
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-----Original Message-----

From: Doehnert.Mark@epamail.epa.gov
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Sent: Wednesday, July 18, 2001 2:45 PM
To: Petullo.Colleen@epamail.epa.gov; ram2@nrc.gov
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Subject: Re: Fwd: Impacted and Non-Impacted Definitions

Colleagues:

Does this explanation work:

As I recall, we were focusing on the null hypothesis that the residual radioactivity in the survey unit exceeds the release criterion, so we would initially assume that a particular area does exceed the release criteria. We decided this for protection of human health, consistent with our regulatory agency missions.

To say that "if there is any potential for residual radioactivity, however slight, would have to be considered impacted" seems to fit this null hypothesis. One has to demonstrate the no reasonable potential to show non-impacted, such as by using the Historical Site Assessment process with a conceptual site model as discussed in Chapter 3. This can be done

without taking any measurements. We have also discussed in meetings that sometimes non-technical drivers still might result in a manager having surveys or samples taken in non-impacted areas.

We should look at the terms in context of the text where we discuss the terms and in context of the performance-based MARSSIM process. I think the definitions come from the text in Section 2.2 "Understanding Key MARSSIM Terminology" where clearly the word reasonable applies to the nonimpacted since the words "some potential" are in contrast to the "no reasonable potential."

Here is the text in 2.2:

"Areas that have no reasonable potential for residual contamination are classified as non-impacted areas. These areas have no radiological impact from site operations and are typically identified early in decommissioning. Areas with some potential for residual contamination are classified as impacted areas."

Adding "reasonable" to the Section 2.2 impacted area text does not seem necessary or appropriate given our null hypothesis, so adding it to the definition seems unnecessary as long as people are using the entire Section 2.2 paragraph to see the bigger picture.

If I look at each definition separately, look at the word "reasonable" and try to compare each without the context of the null hypothesis and chapter 2 text, I would easily see why Commissioner Diaz made his comment.

rea-son-able

1 a : being in accordance with reason a reasonable theory b : not extreme or excessive reasonable requests c : MODERATE, FAIR a reasonable chance a reasonable price d : INEXPENSIVE 2 a : having the faculty of reason b : possessing sound judgment

<http://www.m-w.com>

CC: Conklin.Craig@epamail.epa.gov; david.alberth@apg.amedd.army.mil; david.pugh@usafsg.bolling.af.mil; Deinnocentiis, Vincent; farrandde@navsea.navy.mil; gerald.falo@apg.amedd.army.mil; harold.peterson@eh.doe.gov; Hull.Benjamin@epamail.epa.gov; Kopsick.Deborah@epamail.epa.gov; Newkirk.Phillip@epamail.epa.gov; Poppell.Sam@epamail.epa.gov; Ralston.Lowell@epamail.epa.gov; Richards.Jon@epamail.epa.gov; Stewart Schneider