

January 3, 2001

MEMORANDUM TO: Frederick C. Combs, Deputy Director
Office of State and Tribal Programs

FROM: Larry W. Camper, Chief /RA/
Decommissioning Branch, NMSS/DWM

SUBJECT: REVIEW OF SUGGESTED STATE REGULATIONS FOR THE
CONTROL OF RADIATION REQUIREMENTS FOR FINANCIAL
ASSURANCE

We reviewed the draft copy of Suggested State Regulations for the Control of Radiation (SSRCR), "Requirements for Financial Assurance."

We believe that portions of the SSRCR should be revised to correlate with the structure of NRC regulations. In particular, it appears that the SSRCR attempts to combine uranium milling licensees with other types of materials licensees. Because of the unique statutory requirements applicable to uranium mills under the Uranium Mill Tailings Radiation Control Act (UMTRCA), we suggest that the SSRCR should more fully distinguish the requirements for the uranium mills from other materials licensees. In addition, some parts of the draft appear to conflict with each other regarding the lower limit above which financial assurance is required. Lastly, the SSRCR would allow an exemption for noble gases in sealed sources that appears to be less restrictive than NRC regulations.

Our comments are attached. Please contact Mr. Fredrichs of my staff if you have questions or comments.

Attachment: Comments

Contact: Thomas L. Fredrichs, NMSS/DWM/DCB
(301) 415-5971

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