

STATE OF ILLINOIS
DEPARTMENT OF NUCLEAR SAFETY

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George H. Ryan
Governor

Thomas W. Ortziger
Director



November 27, 2001

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OSP

Office of State Programs
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
Attn: Frederick C. Combs, Deputy Director, STP

Re: State Agreements Program Letter, STP-01-076
"Technical Information: Draft NCRP Document SC87-3, Performance Assessment of
Near Surface Facilities for Disposal of Low-Level Radioactive Waste"

Dear Mr. Combs:

The Illinois Department of Nuclear Safety (Department) hereby provides comments on the above-identified Agreement States letter. The State Programs letter announces the availability of a new draft report prepared by Scientific Committee 87-3 of the National Council on Radiation Protection.

The time period provision for review and comment was 10 business days. We received the State Agreements Program letter on October 29. Comments were requested by November 12. The Department has previously objected to such short comment periods, and anticipated the NRC would resolve the problem. The Department realizes that the NCRP did not provide the NRC a reasonable comment period, however, we expect the NRC to confront the NCRP to preclude any recurrence. While a short comment period may be appropriate for a short document, this document is much too long to review within this time frame.

The length of the NCRP draft document exceeds 450 pages. The Adobe Acrobat file format of the document has been set with security levels that prevent printing and the marking and copying of text passages. The only provision for review of the document is on a computer video monitor. To provide legibility, only half-a-page can be displayed at a time, requiring the review of over 900 screen "pages." Under such confounding conditions, a substantive review can not be completed in the specified time period.

STP-006 Template

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Since such a short comment period virtually precludes review, the Department does not consider the draft document as having been presented in good faith by the NCRP. Such a token review/comment provision is no better than withholding from review altogether. Should you have any questions regarding the Department's perspective, please contact me at (217) 785-9947.

Sincerely,



Joseph G. Klinger, Chief
Division of Radioactive Materials

JGK:DSP

cc: Jim Lynch, Region III, State Agreements Officer