

STATE OF ILLINOIS
DEPARTMENT OF NUCLEAR SAFETY

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November 25, 2002

Secretary
U.S. Nuclear Regulatory Commission
Mail Stop T-9F31
Washington, DC 20555-0001
Attn: Office of Nuclear Regulatory Research

8/28/02
6/F/R 55280
(14)

Re: Comments on Draft NUREG-1761;
"Radiological Surveys for Controlling Release of Solid Materials;"
Notice of Issuance: Federal Register / Vol. 67, No. 167 / Page 55280

Gentlemen:

The Illinois Department of Nuclear Safety (Department) hereby provides comments on the above-identified draft NUREG. The U.S. Nuclear Regulatory Commission (NRC) prepared NUREG-1761 to provide information about measuring residual radioactivity in materials that are to be cleared from nuclear facilities, including guidance about designing, performing, and documenting radiological surveys of solid materials.

The Department recommends that the NRC strengthen the cautionary note on page 47 (line 1772), regarding smear sampling. The note points out that significant variations in smear collection efficiencies render smear sampling qualitative in character, rather than quantitative. In virtually every case-by-case assessment the Department has performed, we have been confronted by licensee misunderstanding of the sound use of smears for decommissioning and facility release. While NUREG-1675 exhaustively addresses other issues pertinent to surveys, comprehensive discussion regarding smear sampling is comparatively neglected. The shortcomings of smear sampling methodology deserve more than a passing reference. While the Department acknowledges that a reference is

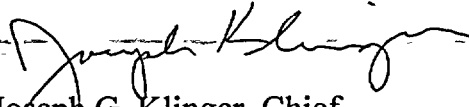
Templett = ADM-013

F-ETDS = ADM 03
Call = To Powers (BEP)

provided to Paul Frame's excellent article on the subject, NRC should consider that the article is not an "official" regulatory document, and may not be readily available in the future. The NUREG's treatment of smear sampling should be expanded to incorporate much of the discussion points covered in Dr. Frame's article.

Should you have any questions regarding the Department's comments, please contact me at (217) 785-9947.

Sincerely,



Joseph G. Klinger, Chief
Division of Radioactive Materials

JGK:DSP

cc: Jim Lynch, State Agreements Officer
Josie Piccone, Deputy Director, Office of State and Tribal Programs