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Subject: Comments on NUREG 1757

Duane and Larry,

Please find below the State of Washington comments on NUREG 1757 Volume 2, from our Division Director, Gary Robertson.

I could not find the notice stating the official person to receive these comments, but since you are the ones most involved in the project, I am sending them to you. They are mainly accolades for doing a good job, (except, of course, our desire for a stand-alone Volume 1 :-). Thanks for involving me in the project and giving the states an opportunity to comment on this important document.

NUREG-1757 Volume 2 - Consolidated NMSS Decommission Guidance
Characterization, Survey, and Determination of Radiological Criteria
Comments from Washington State
December 23, 2002

As part of the Volume 2 writing team, Debra McBaugh of my staff made several suggestions for changes throughout the process of developing Volume 2. These were addressed and changes made as appropriate. She also helped develop the comments from CRCPD's E-24 - Decommissioning and Decontamination Committee in March 2002 and shared them with our staff. Most of the E-24 comments were addressed in a positive manner, except the suggestion, which we agreed with, that Volume 1 be a stand-alone document for Groups 1-4. Although this change was not made, improvements were made to Volume 2 making it easier for staff and licensees to use.

In reviewing the document, we have the following comments:

* It was essential that Volume 2 be written to clearly show what sections of the document apply for each of the Decommissioning Groups. Tables 1.2 and 1.3 make this clear and fill this need.

* We were pleased to note that, as requested by E-24 and agreed to by our staff, "Steps of the Decision Framework" was moved to the Section 1 showcasing it more effectively. It is a very useful part of the document and warrants that recognition.

* Since most of our licensees, with the exception of the uranium mills and the low-level disposal site, fall into Decommissioning Groups 1,2 or 3, decommissioning is very simple for them. Licensing staff thought the iterative process described in Volume 2 was easy to follow and helped assure that most of our licensees will not need to wade through all the steps required for complex sites.

* Licensing staff also appreciated the format of breaking each section into the three categories of Review, Acceptable Criteria and Evaluation. This made the process easier to follow.

Gary Robertson, Director
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The Department of Health works to protect and improve the health of the people of Washington State.

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