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Subject: **Comments on NUREG-1757, Vol. 2, Consolidated Decommissioning Guidance**

Enclosed are Detroit Edison's comments on NUREG-1757, Vol. 2, Consolidated Decommissioning Guidance. Detroit Edison is currently decommissioning Fermi 1 and expects the consolidated guidance to help its efforts.

The guidance is currently contained in many documents and consolidating it will help users. General and specific comments are contained in the attachment to this letter.

If there are any questions on these comments, contact Lynne Goodman at 734-586-1205.

Sincerely,

/s/
William T. O'Connor, Jr.

WTO/LSG/ljd

Enclosure

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Information Management (140 NOC) – Fermi 1 Records
NRR Chron File (Licensing)
NRC Notebook (Fermi 1)

Comments on NUREG-1757, Vol. 2
Consolidated NMSS Decommissioning Guidance

General Comments

Detroit Edison appreciates the consolidation of guidance. It should make conducting of decommissioning more efficient. These comments are directed mainly at how this consolidated guidance could be improved to make it more user friendly or clarified for understanding.

This volume was difficult to read. Also, some portions seemed redundant. Styles varied between sections, with some written more aimed at NRC staff reviewers, similar to Standard Review Plan style, and others directed at licensee users. Appendix M was the best written section from a reader-friendly standpoint. Overall, the impression of the guidance is that decommissioning has been made very complicated.

Specific Comments

Section 1.1 or 1.2 – Explicitly state that the terminology, "DP shall include" also means, "the LTP shall include" in this volume or clarify when it does and does not.

Section 1.4 – Is NUREG-1549 being superceded by this guidance, or will it be separately finalized?

Section 2.7 – Clarify what is meant by single source and sources in this section.

Section 2.7, box on p. 2-13 – Section 2.3 does not appear to be the appropriate reference for calculation of the dose using final concentrations from the FSS.

Section 3.2 – It would be more helpful to provide a practical, but simple example at the end of the section on DQO's.

Section 3.3 – Clarify the first item in the box on p. 3-5. Does it mean that the licensee still needs to determine the amount of contribution from insignificant radionuclides and subtract that from the allowable dose? Does it mean that if insignificant radionuclides are not being considered, then only 90% of dose criteria can be used, or does it mean something else?

Section 4.2 – In second paragraph on p. 4-11, the first sentence states that the LTR does not apply if buildings and structure are disposed of. Clarify that the LTR still applies to the site in this case.

Section 4.3 – Remedial action survey plans should not need to be submitted to the NRC for review. This is an interim step to determine if remediation is sufficient, rather than the final status survey which determines if the site meets the criteria.

The discussion of the need to re-establish baseline parameters, including radionuclides distribution, following remediation clearly implies that DCGLs could be impacted. The DP or LTP need to be able to establish a method of changing DCGLs based on such information, rather than requiring a license amendment for changes to DCGLs. Requiring DCGLs to be revised by license amendment is a waste of NRC and licensee resources and time.

Section 4.4 – Too much detailed information on instrumentation is to be submitted in the DP/LTP per this guidance. This detail would tie licensee to specific instrumentation, even if it does not perform as well as expected or improved instrumentation is available. The DP/LTP should include criteria for instrumentation, rather than specific instrumentation or at least allow for substitutions.

The last three bulleted items in the list of information to be submitted should be in Section 4.5, rather than Section 4.4. This data will be available at the time of the final survey, not at the time of DP/LTP submittal of the description of the final site survey.

Table 4.2 – It appears that part of the table is missing. As a minimum the last item in the left column is missing part of its description.

Section 5.1 – Screening criteria should be usable if residual radioactivity is limited to both building surfaces and surface soil, as long as both the default building and soil scenarios are used.

Section 5.2 – Clarify the last paragraph on p. 5-16 and the same wording on p. 5-25. This guidance was not understood by the reader.

Section 6.3 – This section is confusing. The term, “preferred option” should be better explained. Also, some decisions need to be made on an activity or area basis. For example, whether further cleaning a specific wall would be ALARA should be based on what it would take and the amount of reduction expected to be gained. A formal ALARA program setting up the decision-making criteria would establish this process.

Section A.1 – Clarify whether an area would need to be classified as Class 1 if it did contain equipment with residual radioactivity above the DCGL, but the equipment will be removed before the FSS and the area without the equipment would meet the description of Class 2 or 3.

Section A.3.3 – It would be more convenient if applicable guidance from Chapter 12 of NUREG-1705 was included here, rather then referenced.

It is good that the guidance recognizes that sometimes non-impacted materials similar to materials on site will not be available.

Section A.3 – In general, the summary level of information contained in Sections A.3.x makes this section choppy and difficult to understand.

Section A.4.2 – Specify whether lambda is the average residual radioactivity concentration for all sample points in the survey unit only, or all sample points overall.

Section A.5.1 – If a detector other than a sodium iodide gamma detector is being used, are acceptable estimates of MDC_{scan} provided in any guidance?

Section A.8 – The formulas in this section did not print correctly.

Section A.9 – The reference to Section 2.6 in the paragraph below Table A.4 is not correct. The correct reference may be Section 2.7.

Section B – The introductory paragraph refers to Groups 1-3 using the simplified guidance, while Section B.1 refers only to Group 1 and some of Group 2 licensees.

Section C.2 – item 2 on p. C-7 appears to have an error. The letter "a" is used where probably "α" belongs.

Section C.2 – Clarify whether user would be expected to perform simulation studies if using the approximations on p. C-8 and on p. C-10 – C-11.

Section D.2 – Add explanation for Item 2 on p. D-4 to help user follow the calculation. The explanations for Items 1 and 3 are helpful.

Section E.7 – On p. E-7, move the second formula to after "determined by".

Clarify the last paragraph on p. E-8. The preceding section implies it is necessary to recalculate the instrument MDC, the first sentence in the last paragraph states that generally it will not be necessary.

Section H – This section seems geared towards NRC reviewers, rather than providing guidance on how to use screening values.

Subsections in H.1 and H.2 should be combined for each issue.

Section H.2.1 – Table H.1 has footnote "a" not footnote "1"

Section H.2.2 – The first paragraph and the first Item 3 should be editorially reviewed and corrected.

Section H.2.3 – Should footnote "3" referenced in the box be footnote "c"?

Section I.2.1 – In the third paragraph, add, "which will be remaining" after "systems and equipment".

Item 2 is well written and appropriate. It is important that the conditions anticipated at the time of FSS and site release be the conditions addressed.

Section I.2.2 – Should the reference to Section K.2.3 be to I.2.3?

Section I.3.1 – This section is well written.

Section I.3.3.3.5 – This section is confusing.

Additional guidance would be helpful on how DandD (or RESRAD) is used to determine area factors.

Table I.4 – It would be helpful to know why some of the items listed as potentially being incompatible with DandD assumptions are listed. This would help licensees to evaluate whether an underestimation may occur and provide the requested rationale. Also, are the 4th and 17th items the same?

Section I.5.3.2 – The last two paragraphs of this section are confusing. Is it acceptable to use the dose conversion factors in RESRAD, RESRAD – BUILD, and DandD without an exemption?

Section I.5.3.3 – It would be helpful if the guidance better explained the difference between deterministic and probability codes.

Section I.5.3.4 – There is no Section I.2.3.3 which is referenced in this section.

Section I.5.3.6 – Should "RESRAD Version 3" be "RESRAD – BUILD Version 3"?

Section I.7.3.1 – Clarify in the last paragraph whether DandD is used to run Monte Carlo analyses itself.

Section I.7.3.2.2 – Explain this section much clearer, especially the information in the box.

Section I.7.5 – In general this section is confusing. It appears to be a surface smattering of statistics that is not written for a non-statistician to understand, nor a statistician to fully use.

Section I.7.5.2.1 – An example graph would be helpful to explain this section.

Section I.7.5.2.3 – The symbology is different between the formula and the listing of coefficients

Section J.1 and J.2 – These sections are rather generic and repetitive summary level sections. They do not cover the appendix topic and could be deleted.

Section J.1 – Section 1-2 does not identify the six key components credited to it.

Section J.2 – Clarify how Subpart E demonstrates what the last paragraph in this section states that it does.

Section J.3 – The reference to Section 2.9 should be to Section 3.9.

Section J.5.2 – Identify the terms "SA" and T_w" used in the formula.

Section K.1.3 – The discussion of offsite sources and how they impact PSR and how they are under the licensee's control should be clarified in this section.

Section K.2.5.2 – If a group is both using the PSR area and another impacted area, it is time they could receive total doses above Subpart E dose limit. However, it the impacted area they are using is under control of the licensee, then that part of the dose should be occupational exposure and not added to the PSR area dose for comparison to Subpart E.

Section M, Figures M.3, M.5, M.6, M.7, M.8, M.9, and M.10 – Arrow between Resident Farmer – No Groundwater (or similar block) and "Remove Agricultural Pathway" should be deleted.

Section M, Figure M.11 – Arrow between Urban Resident with Garden and "Remove Garden Pathway" should be deleted.

Section M.5.2.2.1 – Box following Table M.12 should be moved to end of Section M.5.2.1.4.

Section M.4.1 – The version of the DandD code used for the examples should be updated since DandD 1.0 is not recommended for use.

Section M – This is the most user friendly section in the consolidated guidance.

Section N.1.1 – On p N-5, the "8" should be lambda.

Section N.1.4 – The "8" should be a lambda and "PD" should be "P_D" in Examples 1 and 3.

Section N.5 – The first formula on p N-17 did not print properly. "B*total*" should be "B_{total}" on p N-18.

Appendix O – In the second paragraph of the introduction, it states that seven Q&A have been found acceptable by NRC staff and are included. However, only No.'s 1, 2, 6, and 8 are included.