

From: Paul Frame <framep@orau.gov>
To: <nrcprep@nrc.gov>
Date: Tue, Apr 8, 2003 11:56 AM
Subject: Response from "Comment on NRC Documents"

RECEIVED
7:00 PM -8 PM 12:59
Rules and Directives
9/26/02
67FR60707
3

Below is the result of your feedback form. It was submitted by
Paul Frame (framep@orau.gov) on Tuesday, April 08, 2003 at 11:57:05

Document_Title: NUREG 1757 Vol. 2 Consolidated NMSS Decommissioning Guidance

Comments: Appendix B section B.2

1. "size is limited to 100 m² for land areas and 2000 m² for structures"

These values should be reversed.

2. It would be helpful to actually describe the MARSSIM simplified method rather than reference it. Appendix B in MARSSIM is not clear in what it says. For example, MARSSIM implies but does not state explicitly that a FSS could be avoided completely by filing the appropriate paperwork. The old NUREG 0241 was much clearer concerning this matter.

3. When I read B.2 the "Alternative Simplified Method," it is not readily apparent why this is considered simplified. For example, requiring a 100% scan and 30 samples is not what I would consider a simplification. It would help if the reasons why this method is simpler than the standard protocol were spelled out.

organization: PTP MS 11

address1: Oak Ridge Associated Universities

address2: PO Box 117

city: Oak Ridge

state: TN

zip: 37831-0117

country: USA

phone: 865 576 3388

template = ADM-013

F-RIDS = ADM-03
Add = J. Schmitt (DWS2)