

Central File



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

SEP 28 1990

Dr. Dade W. Moeller  
Chairman  
Advisory Committee on Nuclear Waste  
Washington, DC 20555

Dear Chairman Moeller:

I have reviewed the Advisory Committee's comments on decommissioning plans and activities for other than 10 CFR Part 50 licensed facilities and concur in your proposal to join with Nuclear Regulatory Commission (NRC) staff in examining and resolving key issues at a few sites to be selected from among the approximately 40 sites currently listed in the Site Decommissioning Management Plan (SDMP). In particular, your proposal to highlight key technical issues and help the staff address these issues on a generic basis is a reasonable approach. I request that you work with the Office of Nuclear Material Safety and Safeguards to select the sites where your assistance would be most beneficial. To ensure maximum benefit for your reviews, any site selected should not be in the final stages of decommissioning.

With regard to the additional factors you discussed in your memorandum, we have a number of activities underway and also intend to be involved in others, as you suggested. We agree that the U.S. Department of Energy (DOE), through its current cleanup program, is gaining considerable experience, and also agree with the need for technology transfer in this area. Along these lines, we have had meetings with DOE to discuss the status of its program, and intend to expand this effort, including visits to DOE sites, where appropriate. The staff have asked DOE to include NRC on the distribution list for DOE documents that may be useful to NRC and its licensees.

We also agree with you regarding the importance of development of residual radioactivity criteria, as well as means for determining whether a given facility meets the dose criteria. These matters are receiving detailed attention by the staff, as is summarized in Sections E.1 and E.5 of the SDMP. In particular, pathway models to derive total effective dose equivalent to an individual from residual contamination are under development, as presented in NUREG/CR-5512, which was issued for comment in January 1990, and which is scheduled for final issue later this year. In June 1990, NRC issued the policy statement on "Below Regulatory Concern," establishing the basis for future agency regulations and licensing decisions that would exempt certain very low levels of radioactive material from regulatory controls. Currently the staff is preparing interim residual radioactivity criteria and, following that, an amendment to the regulations to codify residual radioactivity criteria will be prepared. In addition, Oak Ridge Associated Universities is preparing a survey manual, for NRC, which will provide detailed guidance on conducting both licensee site surveys and independent verification surveys, to demonstrate that NRC decommissioning criteria have been met. In developing the criteria discussed, NRC staff has and will continue to keep abreast of relevant developments within the National Council on Radiation Protection, the American National Standards Institute, and the Interagency Task Force, both through active participation and by other direct contact.

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Thank you for providing us with your proposed plans and comments in the area of decommissioning reviews of other than 10 CFR Part 50 facilities. I anticipate that your work with the NRC staff on decommissioning these types of facilities will be helpful.

Sincerely,

Original Signed By:  
James M. Taylor

James M. Taylor  
Executive Director  
for Operations

cc: Chairman Carr  
Commissioner Rogers  
Commission Curtiss  
Commissioner Remick  
SECY

Distribution: EDO 0005808

Central File#	NMSS r/f	LLRB R/F	LLWM R/F	JTaylor
HThompson	NMSS DO r/f	AEiss	RBangart	DMorris, EDO
JGreeves	RCunningham	DCool	EKraus	JAustin
TJohnson	FCardile	JSniezek	JBlaaha	EBeckjord
TMurley, NRR	EJordan, AEOD	JScinto, OGC	WBrown, PMDA	CDefino
EDO r/f	CJenkins	LLWM t/f		
PDR YES <u>X</u>	NO	Category: Proprietary ___ or CF Only ___		
ACNW YES <u>X</u>	NO			

SUBJECT ABSTRACT:  
\*See Previous Concurrence

OFC :LLRB*	:LLRB*	:LLRB*	:TECHEDIT*	:RES*	:IMNS*	:LLWM*	:
NAME:FCardile	:TJohnson	:JAustin	:EKraus	:DCool	:RCunningham	:JGreeves	:
DATE:09/17/90	:09/17/90	:09/19/90	:09/19/90	:09/20/90	:09/20/90	:09/24/90	:

OFC :LLWM*	:NMSS/PMSI:DO/NMSS	:D/NMSS	:DED/EDO	:EDO	:	:
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TJohnson	FCardile	JSniezek	JBlaaha	EBeckjord
TMurley, NRR	EJordan, AEOD	JScinto, OGC	WBrown, PMDA	CDefino,
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PDR YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>	Category: Proprietary <input type="checkbox"/> or CF Only <input type="checkbox"/>		
ACNW YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>			

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Thank you for providing us with your proposed plans and comments in the area of decommissioning reviews of other than 10 CFR Part 50 facilities and I anticipate that your work with the NRC staff as it establishes plans for regulating the decommissioning of these types of facilities will be of benefit in their efforts.

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