



Department of Energy
Washington, DC 20585
June 30, 2003

2571

DOCKET NUMBER
PROPOSED RULE PR 20
(68FR 09595)

DOCKETED
USNRC

July 8, 2003 (2:26PM)

Secretary
U.S. Nuclear Regulatory Commission
Washington, DC 20555

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

Attention: Rulemaking and Adjudications Staff

To Whom it May Concern:

The Department of Energy (DOE) appreciate the opportunity to participate in the May 21-22, 2003, workshop on alternatives for controlling the disposition of solid materials that originate in certain areas of Nuclear Regulatory Commission (NRC) licensed facilities and that may contain no or very small amounts of radioactivity resulting from licensed operations. As we noted at the workshop, this is a very important rulemaking and DOE supports NRC's efforts to carefully evaluate options for managing these materials. The workshop provided a useful and constructive exchange of information and built upon previous efforts.

We believe the recent publications by the National Council on Radiation Protection and Measurement and the National Academy of Science provide useful source material that identify a useful starting point for development of a risk-based standard. We believe the alternatives identified at the workshop include most reasonable alternatives and that the NRC should consider both national and international consensus standards in their analyses. In general, we believe the most effective approach will include appropriate use of several of the alternatives in a systematic property management system.

Although the NRC rule does not directly apply to DOE operations, DOE's goal is to maintain standards that are consistent with standards that apply to the commercial sector, so your process is of great interest to DOE. DOE looks forward to continued participation in NRC workshops and other opportunities to share information with the Commission staff relating to the control and release of property. Where possible, we also look forward to sharing technical information such as modeling and data analysis and will provide data and information DOE develops that may be pertinent to NRC's efforts as they become available.

Sincerely,

for Andy Lawrence
Director
Office of Environmental Policy and Guidance

cc: Frank Cardile, NMSS

Template = SECY-067

SECY-02