



STATE OF WASHINGTON
DEPARTMENT OF HEALTH
ENVIRONMENTAL HEALTH PROGRAMS

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October 30, 2003

Duncan White, CHP
Regional State Agreements Officer
Division of Nuclear Materials Safety
Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, Pennsylvania 19406-1415

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REGION 1

Dear Mr. White:

It was a pleasure to meet you during the recent review of our Office of Radiation Protection. Thank you for the opportunity to comment on the draft report of your review. My staff has provided a few technical comments, which are attached to this letter. Overall however, we are very pleased with the report and want to assure you that we are working diligently to address the one recommendation you have provided. It is our intention to have a complete work plan to you in time for the Management Review Board (MRB). Gary Robertson, Director of the Office of Radiation Protection, will be in contact with you regarding our availability for the MRB.

On behalf of Mary Selecky, Bill White, and myself, please accept our thanks for your team's thoroughness in helping the Washington Department of Health maintain not just an "adequate and compatible" program, but one that is a national leader.

Sincerely,

Janice Adair
Acting Assistant Secretary



The Office of Radiation Protection's technical comments:

REPORT:

Page 1 - second (real) paragraph - The Eastern Regional Director is noted to be "primarily responsible for the low-level radioactive waste disposal activities at Hanford which is not subject to NRC jurisdiction." This should be changed to read: "... primarily responsible for oversight of activities on the Hanford Nuclear Reservation."

Page 2 - last paragraph of section 1.0 - the very last sentence requests our response to "all recommendations in the final report". There is only one "recommendation" in the draft report.

Page 2 - Section 3.1, second paragraph - Change the third sentence to read "These positions were created partially to focus a higher level of management attention on activities on the Hanford Nuclear Reservation and partially for succession planning."

Page 3 - third paragraph - The third sentence is incomplete. It should read: "Staff members are required to have a bachelor's degree or equivalent experience in a physical science, engineering or biological science."

Page 3 - fourth paragraph - The third sentence should read: "For the six sections in the Office, this would require ..." This change makes it clear that the two Sections comprising the Agreement State program are not alone in needing to address the required FTE reduction.

Page 4 - first paragraph - Near the end, the assertion is made that the first responders did not "have" alpha or beta detection capability. It is more accurate to state they did not "use" their alpha/beta detection capability, instead relying on their "high-tech" gamma analyzers. Subtle difference, but more accurate.

page 6 - fourth paragraph - in the last sentence, the name of the Section is "Environmental Radiation Section".

Page 6 - fifth paragraph - ATG is located at Richland, WA (not Hanford, since it is not on the Hanford Nuclear Reservation proper).

Page 6 - fifth paragraph - in the sixth line, the term is "mixed waste" (not "mixed radioactive waste"); the term "mixed waste" means "both radioactive and hazardous wastes combined". To use "mixed radioactive waste" is confusing.

Page 6 - fifth paragraph - the name in the last line should be "Pacific EcoSolutions, LLC" (note, there is NO space between "Eco" and "Solutions")

Page 10 - Section 4.1.1 - in the fifth line, the word "impacted" is used improperly (to "impact" is "to hit"). It should be "affected".

Page 10 - Section 4.1.2, second paragraph - again, "impacted" is not the right word; use "affected".

Page 12 - Section 4.2.2, fourth paragraph - the lead in, "In most cases", implies some files "did not" contain the items listed. We suggest the sentence read: "Of the registration files reviewed, all were found to contain all correspondence, photographs ... "?