

Savannah River Site

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A U.S. Department of Energy Site-Specific Advisory Board

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November 18, 2005

Ms. Anna H. Bradford
Nuclear Regulatory Commission
MS T7J8
11545 Rockville Pike
Rockville, MD 20852

Subject: Comments on NRC Standard Review Plan Scope

Dear Ms. Bradford:

The Savannah River Site (SRS) Citizens Advisory Board (CAB) would like to thank you for hosting the public meeting to solicit comments on the draft waste determination Standard Review Plan (SRP). We understand that the Nuclear Regulatory Commission (NRC) will use the SRP as guidance on future waste determination information and analyses. This is an excellent example of government agencies acknowledging the legitimate interests of public citizens in activities affecting their community and environment.

These written comments expand on those oral comments we presented at the November 10, 2005 public meeting. The SRS CAB supports a risk-informed and performance-based decision process. The draft SRP outline appears to follow this approach. We also believe that the performance objectives of 10 CFR 61, Subpart C are adequate protection standards and the SRP modeling approach provides adequate risk mitigation assurances.

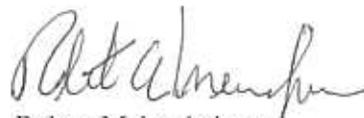
One item that needs to be addressed is the timeframe it takes NRC to perform the SRP. The SRS CAB would like to see NRC establish a standard consistent SRP review time (i.e., 30-60 days). During this review period, NRC should also consider holding an informational public meeting of interested affected parties (general public, South Carolina Department of Health and Environmental Control (SCDHEC), EPA, etc.) to discuss the waste determination analyses. Furthermore, this review period should not interfere with closure actions associated with enforceable schedules in applicable Federal Facility Agreements.

Again, the SRS CAB appreciates the opportunity to provide comments to assist NRC with the SRP process.

Sincerely,



Jean Sulc
Chairman
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