



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION I
475 ALLENDALE ROAD
KING OF PRUSSIA, PENNSYLVANIA 19406

JUN 05 1991

State University of New York
Research Center
ATTN: Linda Downing
Research Assistant
319 Piez Hall
Oswego, New York 13126

Dear Ms. Downing:

We are returning the draft copy of your paper with our comments. If you have any questions regarding these comments, please feel free to contact me at (215) 337-5214.

Additionally, I would like to reiterate several general comments discussed during our telephone conversation on May 30, 1991.

1. The utility is responsible for radiological environmental monitoring around a particular site. State programs serve only as verification or quality assurance programs of the utility's program. The State programs are not intended to be complete radiological environmental monitoring programs.
2. The radiological environmental monitoring program is designed to monitor potential pathways for human radiation exposure. The program is not designed to monitor all possible indicators of bioaccumulation in the environment.
3. It may be difficult to use data to assess sampling and analytical protocols. For example, sampling and analytical protocols determine the detection limit and, therefore, the "quality" of the data.
4. Although the paper is entitled, "Nine Mile Point Nuclear Surveillance Program - A Summary", the paper appears to focus on the New York State radiological environmental monitoring verification program extensively. Perhaps the paper should be given a different title to more accurately reflect its focus. Additionally, the recommendations appear not to discuss sampling protocols, but rather sampling locations and frequency. There is virtually no discussion of analytical protocols.

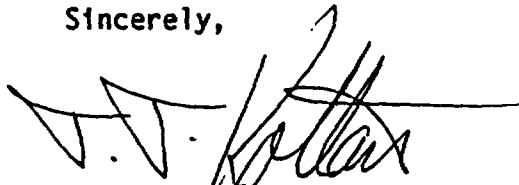
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5. The tables appear to be incomplete. More information is needed regarding the data presented in the tables. Were "less than" values included? What about results that include "zero", i.e., 6 ± 4 , for example. The standard deviation should be reported with the average. The "total n" should be defined. The reporting of data without the associated uncertainty is the reporting of meaningless data.

Sincerely,

A handwritten signature in black ink, appearing to read 'J.J. Kottan', written over a horizontal line.

James J. Kottan

Enclosure:
As Stated