

NRCREP - State of Idaho Comments on the Draft Standard Review Plan for Activities Related to U.S. Department of Energy Waste Determinations

From: <Bruce.Olenick@deq.idaho.gov>
To: <NRCREP@nrc.gov>, <AHB1@nrc.gov>
Date: 07/31/2006 6:25 PM
Subject: State of Idaho Comments on the Draft Standard Review Plan for Activities Related to U.S. Department of Energy Waste Determinations
CC: <Kathleen.Trever@deq.idaho.gov>, <xyx@nrc.gov>, <scf@nrc.gov>, <SHERRIMD@dhec.sc.gov>, <Lezlie.Aller@deq.idaho.gov>, <Bruce.LaRue@deq.idaho.gov>

The State of Idaho's comments on the subject document are attached. If you have any questions, please do not hesitate to contact me.

Bruce Olenick
 Environmental Analyst/Quality Assurance Program Mgr
 Division of INL Oversight and Radiation Control
 State of Idaho - Department of Environmental Quality
 900 North Skyline, Suite C
 Idaho Falls, ID 83402
 (208) 528-2614

5/31/06
 71 FR 30967

⑦

RECEIVED

2006 JUL 31 AM 9:51

PLS-2

RULES AND DIRECTIVES
 BRANCH
 IDHRC

60NSI Review Complete

Template = ADM-013

E-RIDS = ADM-013

Add = A. Mordfox (AHB1)

July 31, 2006

SENT VIA E-MAIL

Chief
Rules Review and Directives Branch
Mail Stop T6-D59
U.S. Nuclear Regulatory Commission
Washington DC 20555-001
Attention: Anna Bradford (AHB1@nrc.gov)

RE: *State of Idaho Comments on the Draft Standard Review Plan for Activities Related to U.S. Department of Energy Waste Determinations, NUREG-1854, Federal Register: May 31, 2006 (Volume 71, Number 104), Docket Nos. PROJ0734, PROJ0735, PROJ0736, and POOM-32.*

On May 31, 2006, the U.S. Nuclear Regulatory Commission issued a draft standard review plan for Activities Related to U.S. Department of Energy Waste Determinations for public comment. The state of Idaho has reviewed the draft standard review plan (SRP) and has the following comments:

1. The document is well written and provides for detailed guidance for reviews of DOE waste determinations by the NRC that are defensible and repeatable.
2. Example 2-2 on page 3-20 of the SRP describes a scenario using residual contamination "thickness." This example relates to concentration averaging calculations which use "volume" (e.g. cubic centimeters) as its standard of measure. However, the last sentence states that concentrations would be reduced by a factor of 20 *if* a volume basis were used. This example is, more appropriately, an illustration of a "volume" calculation and not "mass" as the last sentence insinuates. This example should use an actual mass or a conversion from "thickness" to mass to better illustrate the scenario if an illustration of a "mass" calculation was intended.
3. Section 10 (Monitoring) is very general and does not provide many specifics related to the types of monitoring and reporting that may be necessary under the NDAA. The state of Idaho recommends that additional consultation occur with the applicable States to ensure that the essential components of "monitoring" under the NDAA are addressed in this section before the NRC finalizes this plan.
4. Section 10.2 (lines 33-34) of the SRP recommends that DOE develop a monitoring plan to meet the intent of the NDAA since "it is the agency that is most cognizant of the site". While this is certainly a valid possible

methodology, the State understands that DOE will not develop a monitoring plan to solely meet the NDAA since it is a responsibility of the NRC. This statement should be agreed to by both DOE and the NRC prior to inclusion in the SRP.

5. Under section 10.2 of the SRP, lines 46-48, the NRC makes a statement that "the State has specific regulatory authority at the DOE site and the monitoring plan may include areas already regulated by the State". In Idaho, since DOE is self-regulating for radionuclides, this sentence would be more appropriate to claim that "the State *may have* specific regulatory authority..." which describes, more broadly, those situations not subject to other regulatory programs such as CERCLA or RCRA.

Please contact me at 208-528-2614 if you have any questions regarding these comments.

Sincerely,

(Signature on file)

Bruce Olenick
Environmental Analyst
State of Idaho, Department of Environmental Quality
Division of INL Oversight and Radiation Control (DEQ-INL)

Mail Envelope Properties (44CE8342.39F : 10 : 33695)

Subject: State of Idaho Comments on the Draft Standard Review Plan for Activities Related to U.S. Department of Energy Waste Determinations

Creation Date Mon, Jul 31, 2006 6:24 PM

From: <Bruce.Olenick@deq.idaho.gov>

Created By: Bruce.Olenick@deq.idaho.gov

Recipients

nrc.gov

TWGWPO01.HQGWDO01

NRCREP

nrc.gov

OWGWPO01.HQGWDO01

AHB1 (Anna Bradford)

nrc.gov

TWGWPO04.HQGWDO01

XXY CC (Xiaosong Yin)

nrc.gov

OWGWPO02.HQGWDO01

SCF CC (Scott Flanders)

deq.idaho.gov

Bruce.LaRue CC

Lezlie.Aller CC

Kathleen.Trever CC

dhec.sc.gov

SHERRIMD CC

Post Office

TWGWPO01.HQGWDO01

OWGWPO01.HQGWDO01

TWGWPO04.HQGWDO01

OWGWPO02.HQGWDO01

Route

nrc.gov

nrc.gov

nrc.gov

nrc.gov

deq.idaho.gov

dhec.sc.gov

Files

MESSAGE

Size

385

Date & Time

Monday, July 31, 2006 6:24 PM

TEXT.htm	3603	
DEQ-INL Comments on NRC Draft SRP.doc		40960
Mime.822	62876	

Options

Expiration Date:	None
Priority:	Standard
ReplyRequested:	No
Return Notification:	None

Concealed Subject:	No
Security:	Standard

Junk Mail Handling Evaluation Results

Message is eligible for Junk Mail handling
This message was not classified as Junk Mail

Junk Mail settings when this message was delivered

Junk Mail handling disabled by User
Junk Mail handling disabled by Administrator
Junk List is not enabled
Junk Mail using personal address books is not enabled
Block List is not enabled