



UNITED STATES
NUCLEAR REGULATORY COMMISSION
ADVISORY COMMITTEE ON NUCLEAR WASTE
WASHINGTON, D.C. 20555

September 6, 1990

The Honorable Kenneth M. Carr
Chairman
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Chairman Carr:

SUBJECT: DECOMMISSIONING REVIEWS FOR OTHER THAN 10 CFR PART 50
LICENSED FACILITIES

During its 23rd meeting, August 29-30, 1990, the Advisory Committee on Nuclear Waste discussed the ongoing reviews by the NRC staff of decommissioning plans and activities for other than 10 CFR Part 50 licensed facilities. In response to your request, we are pleased to provide the following comments on this matter.

As you know, we recently met with the NRC staff to discuss plans for its review of the decommissioning of the Pathfinder Atomic Power Plant. This experience confirmed that such operations, whether they pertain to nuclear power plants or other types of NRC licensed facilities, involve a wide range of topics and activities of interest to this Committee. These include the types and quantities of radioactive wastes produced and possible steps for reducing their volumes, as well as steps that might be taken to reduce or avoid the generation of wastes that fall into the mixed waste category. Also of interest are the development of permissible limits for the release of decommissioned facilities for unrestricted use and relevant applications of the recently issued BRC Policy Statement. Because we believe we can assist in resolving these issues, we look forward to working with the staff on these matters.

If you concur, we would plan over the next few years to join with the NRC staff in examining and resolving key issues at a few sites, selected from among the approximately 40 that have thus far been identified. Although experience to date indicates that the problems at each site are different, one of our goals will be to highlight key technical issues and to assist the staff in addressing them on a generic basis.

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Our discussions with the NRC staff, and information presented in SECY-90-121 (Reference), indicate that certain factors should be kept in mind as this program develops. Listed below are three that were brought to our attention by the NRC staff and with which we concur:

1. Through its current cleanup program, the U.S. Department of Energy is gaining considerable expertise in this area. Every effort should be made to ensure that the related technology is transferred for use by the NRC and its licensees.
2. The NRC staff needs to keep abreast of, and to develop a capability for processing, the latest environmental transport and dose evaluation models applicable to assessments of decommissioned facilities. Although it is relatively easy to establish a dose limit for permitting such facilities to be released for public use, the determination of whether a given facility meets the dose rate criteria is much more difficult. This involves not only the application of the previously mentioned models but also the development of procedures for conducting followup surveys of the decommissioned facilities.
3. In order to make such determinations, the NRC needs to obtain guidance on a variety of factors, including acceptable contamination limits for decommissioned facilities and/or sites. In this regard, the staff should keep abreast of relevant developments within the National Council on Radiation Protection and Measurements, the American National Standards Institute, and the Interagency Task Force chaired by EPA that we understand is addressing this subject.

We trust this responds to your request, and we look forward to working with the NRC staff as it establishes plans for regulating the decommissioning of these types of facilities.

Sincerely,



Dade W. Moeller
Chairman

Reference:

SECY-90-121 dated March 29, 1990 for the Commissioners from James M. Taylor, Executive Director for Operations, Subject: Site Decontamination Management Program