



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

September 28, 1995

The Honorable Shirley A. Jackson
Chairman
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Dear Chairman Jackson:

SUBJECT: COMMENTS ON STREAMLINING THE SITE DECOMMISSIONING
MANAGEMENT PLAN PROGRAM

During its 76th meeting the ACNW heard a presentation from and had discussions with members of the NRC staff on the streamlining process anticipated for the Site Decommissioning Management Plan (SDMP) Program. The Committee discussed this topic further during its 77th meeting, September 20-21, 1995. The Commission requested this review in the referenced SRM. We also had the benefit of information from the briefing that the NRC staff gave to the Commission on this topic.

The NRC staff is developing a process for improving and streamlining the SDMP Program and associated activities. The details of the NRC staff's final proposal await the results of further work by the staff and the results of public meetings and workshops to be held by the staff. Although our final report must await the outcome of these activities, the Committee wishes to bring to the attention of the Commission several important issues raised at the 76th meeting.

The Committee believes that there are two signal milestones in the decommissioning of a site: (1) the initial definition of the scope and magnitude of the contamination problem and (2) the determination of the final results of the decontamination effort.

The Committee believes that these analytical efforts are crucial to the success of the decontamination process and its acceptance by the public as an action that protects its health and safety. Of particular importance, the NRC, other agencies, and the public require assurance that the site, when released, will not represent a hazard. The final site survey and its confirmation will be crucial to this goal. We strongly recommend the NRC staff ensure that in the process of cost reduction and streamlining, the assurance of the quality and scope of the final survey not be compromised. We urge that if the NRC staff believes that the necessity for confirmatory analyses can be supplanted, the staff should ensure that the final survey plan and accompanying quality assurance procedures are carefully crafted by the practitioner and

reviewed by the NRC staff. The NRC staff should include effective audits of the survey process in its management activities. The Committee is convinced that this phase of the SDMP process should not yield to economic strictures.

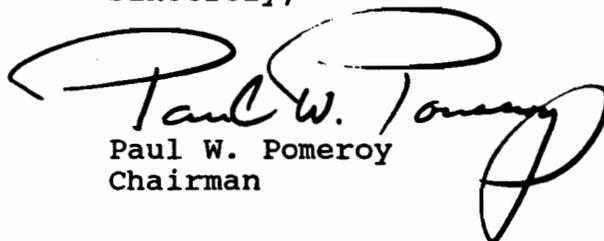
The Committee learned that the current process of assigning priorities to sites for attention is based largely on the experience of the NRC staff. While the Committee recognizes the need to function in a qualitative manner until more information is developed on the risks posed by each of the sites that have not been evaluated in detail, we urge the NRC staff to approach the prioritization process as quantitatively as the information will allow. This will ensure a defensible strategy in the shortest time for the remediation of sites that pose the greatest risk.

The Committee was pleased to hear the concern of the NRC staff with groundwater contamination and commends the high priority the staff places on diagnostic action when such contamination is suspected or possible. We also encourage the NRC staff to develop general strategies for dealing with groundwater contamination that appears likely to approach regulatory limits.

The Committee heard about the plans of the NRC staff to make use of the manuals, being developed in conjunction with EPA and other agencies, that define protocols for gathering and managing field data. Those prescriptive manuals may be beneficial to the process. We also believe that the staff should pursue qualification of the laboratories that perform the radiochemical analyses.

The ACNW plans to continue to review this topic after the public hearings are over and draft documents are complete. In addition, the Committee plans to review the proposed rule for radiological criteria for decommissioning that will incorporate the results of public comments. Our preliminary report highlights issues that the Committee believes should be noted during the formulation of plans and preparation of documents for the SDMP Program.

Sincerely,



Paul W. Pomeroy
Chairman

Reference:

Staff Requirements Memorandum dated May 30, 1995, from John C. Hoyle, Secretary, to James M. Taylor, Executive Director for Operations, Subject: May 19, 1995 Briefing on Site Decommissioning Management Plan Program and Policy Issues