

Richard



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July 2, 2015

Ms. Kathleen Cuzzolino  
Environmental Protection Specialist  
Gateway National Recreation Area  
210 New York Avenue  
Staten Island, New York 10305

Re: Role of the United States Nuclear Regulatory Commission at the Great Kills  
Park Site, Gateway National Recreation Area on Staten Island, New York

Dear Ms. Cuzzolino:

I am writing on behalf of my client, the City of New York ("City"), with regard to the United States Nuclear Regulatory Commission's ("NRC") letter dated April 7, 2015 soliciting input from the National Park Service ("NPS") regarding how NRC should coordinate its jurisdiction over the radium-226 contamination located at the Great Kills Park Site, Staten Island, New York, ("Great Kills" or "Site"), part of the Gateway National Recreation Area. The City supports the approach suggested by NRC of entering into a memorandum of understanding ("MOU") with NPS, rather than NPS securing a license from NRC to perform the decommissioning of the Site, as the preferred means for NRC to coordinate its jurisdiction with that of NPS.

The City believes that an MOU between NPS and NRC is appropriate and supported by precedent because the Site is federally owned, there is no immediate threat to public health and safety presented at Great Kills due to protective measures taken by NPS, and the investigation and subsequent remediation of contamination at the Site is taking place pursuant to the Comprehensive Environmental Response Compensation and Liability Act. An MOU would avoid unnecessary dual-regulation over the cleanup, streamline the remedial process, achieve efficiencies beneficial to all stakeholders and involved agencies, and facilitate communication between all involved parties. The City also believes that NRC involvement at

the Site should be coordinated in conjunction with the review and comment process NPS will be establishing to solicit comments from other government agencies and stakeholders.

Please do not hesitate to contact me if you have any questions or concerns.

Sincerely yours,



Kathleen C. Schmid

Cc: Larry W. Camper, Director, Division of Decommissioning, Uranium Recovery and Waste Programs, Office of Nuclear Material Safety, United States Nuclear Regulatory Commission  
Casey S. Padgett, Assistant Solicitor, U.S. Department of the Interior  
Robert Orlin, General Counsel, New York City Department of Sanitation  
Alessandro Olivieri, General Counsel, New York City Department of Parks & Recreation  
Thomas Merrill, General Counsel, New York City Department of Health & Mental Hygiene  
John Rousakis, General Counsel, New York City Department of Environmental Protection