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December 2, 1996



VIA FACSIMILE

Mr. John C. Hoyle
Secretary of the Commission
U.S. Nuclear Regulatory Commission
ATTN: Chief of Docketing and Services Branch
Washington DC 20555-0001

Dear Secretary Hoyle:

Enclosed are the Maryland Radiological Health Program's comments on the Nuclear Regulatory Commission Strategic Assessment and Rebaselining Initiative. Thank you for the opportunity to comment on this subject.

If you should have any questions, please feel free to contact me at (410) 631-3300. You may also reach my office toll-free by dialing 1-800-633-6101 and requesting extension 3300.

Sincerely,

Roland G. Fletcher, Manager
Radiological Health Program

RGF:dpn

Enclosure

CC: Robert Quillin

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State of Maryland**Comments on****U.S. NRC Strategic Assessment and Rebaselining Initiative****Direction Setting Issue Paper #9*****Decommissioning Non-Reactor Facilities**

It appears that the best upcoming scenario would be a combination of points within the options. NRC should not allow decommissioning of major licensees without the preliminary approval of a decommissioning plan. However, the SDMP and SDMP Action Plan is too prescriptive and should more performance oriented. The 15 mRem/year for unrestricted release is way to low and should be raised to 50 mRem. I disagree with aspects of the option which allows NRC the authority to transfer its difficult cases to the EPA. This appears to be an option which may add years to the effective clean-up of sites.