

DSI-22 (20)



Conference of Radiation Control Program Directors, Inc.

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November 27, 1996

Mr. John C. Hoyle
Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

ATTN: Chief of Docketing and Services Branch

Dear Mr. Hoyle:



Enclosed are the comments from the Conference of Radiation Control Program Directors, Inc. (CRCPD) Board of Directors on the U.S. Nuclear Regulatory Commission's (NRC) Strategic Assessment and Rebaselining issues papers. The CRCPD is a national organization dedicated to radiation protection and whose membership is made up of personnel from state, territorial, and local radiation control programs throughout the country.

The activities of the NRC, especially in the radioactive materials area, have a significant impact on state and local radiation control programs. We have concentrated our comments on those issues papers that most directly impact the future of the programs represented in CRCPD. Comments are enclosed on the following Direction Setting Issues Papers:

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|--------|---|
| DSI 2 | Oversight of the Department of Energy |
| DSI 4 | NRC's Relationship with Agreement States |
| DSI 5 | Low Level Waste |
| DSI 6 | High Level Radioactive Waste |
| DSI 7 | Materials/Medical Oversight |
| DSI 9 | Decommissioning - Non-Reactor |
| DSI 12 | Risk-Informed, Performance-Based Regulation |
| DSI 13 | Role of Industry |
| DSI 14 | Public Communication Initiatives |
| DSI 21 | Fees |
| DSI 22 | Research |
| DSI 23 | Enhancing Regulatory Excellence |
| DSI 24 | Power Reactor Decommissioning |

We appreciate the opportunity to comment on these issues and your consideration of our concerns.

Sincerely,

William P. Dornishe

William P. Dornishe
Chairman, CRCPD

Enclosures

A Partnership Dedicated to Radiation Protection

Acknowledged by card 12/31/96 [signature]

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**CRCPD Board of Directors
Comments on**

**NRC DIRECTION SETTING ISSUE PAPER 22
RESEARCH**

The Commission's preliminary view of Option 4 (conduct both confirmatory and exploratory research) is the best option. However, the option should have the flexibility to move away from the present approximate 80/20 allocation of research funds to confirmatory / exploratory research as the need arises. This flexibility would balance the research needs related to current licensing issues and permit response to programmatic needs as well as anticipation of future needs. It is important for NRC to maintain an active and independent research program so that they do not have to rely solely on the industry's technical research and an independent assessment can be conducted on the adequacy of safety issues. The collaboration of a core group at NRC focused on well-defined technical priorities with exploratory research conducted in universities would appear to be the best approach. It is also prudent that the Commission maintain its participation in international safety programs if possible.

With regard to subsumed issue 1, regarding core expertise, it may be easier to maintain some of the areas of expertise through contractual arrangements at national laboratories and universities than to maintain staff expertise in all areas.