

Georgia Department of Natural Resources

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DSI-24

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November 21, 1996



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 Mr. Hoyle,

Please accept these comments on the Direction Setting Issue (DSI) papers issued by the Nuclear Regulatory Commission (NRC) as part of the Strategic Planning initiative.

The Radioactive Materials Program of the Georgia Department of Natural Resources is submitting comment on DSI #'s 4, 7 and 24 because these have the potential to impact directly and immediately on our radiation safety program. All other DSI's also have the potential to affect our program. Although we are not submitting comments on the remaining issue papers we fully support and endorse the comments by the Organization of Agreement States and the Conference of Radiation Control Program Directors on these DSI's.

Thank you for the opportunity to provide comments, both in written form and orally at the previously held public hearings.

Sincerely,

A handwritten signature in black ink that reads "Thomas E. Hill".

Thomas E. Hill, Manager
Radioactive Materials Program

TEH
enclosures

Acknowledged by card 12/23/96 DMS

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**Comments on USNRC's Strategic Assessment and Rebaselining Initiative
by the Georgia Department of Natural Resources Radioactive Materials Program**

Direction Setting Issue Paper # 24
Decommissioning - Power Reactor

Summary

While the commission's preliminary view selecting Option 1 (Continue the current direction and approach) seems on the surface to be supporting the status quo, the examples of innovative regulatory approaches that the Commission suggests could change the direction dramatically. Georgia does not favor the transfer of a defueled reactor to state control. We were the recipient of an AEC licensed air shielded reactor irradiator after the fuel was removed. Once is enough. NRC should see the decommissioning through to release for unrestricted or possibly restricted use. If the Commission wants the staff to consider transfer of a nuclear power plant to state control, then Georgia would like to be brought into the discussion now to contribute ideas about what a regulatory program for a shut-down and defueled reactor site should look like. Also, if the Commission wants the staff to consider transfer of a nuclear power plant to state control with the fuel still on site, but in dry cask storage, there are many implications for state resources. The option for NRC to reduce oversight and just perform a radiological assessment of the site when it is ready to be released is interesting, but has some implications for a state's emergency planning about what to do in the case of an offsite release.

The Commission should be able to shift into Option 2 (pursue current direction and approaches more aggressively) if there are more plants which are shut down prematurely as a result of deregulation. We are particularly concerned about a shortfall of decommissioning funds.