



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

ACNWR-0027

PDR

October 18, 1989

The Honorable Kenneth M. Carr
Chairman
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Chairman Carr:

SUBJECT: PATHFINDER ATOMIC POWER PLANT DISMANTLEMENT

During its 13th meeting, September 13-15, 1989, the Advisory Committee on Nuclear Waste met with representatives of the NRC staff to discuss the proposed dismantlement of the Pathfinder plant. This was also a subject of discussion among the Committee members during our 14th meeting, October 11-13, 1989. On the basis of these discussions, the following comments are provided.

Because the criteria that are established during the dismantlement of the Pathfinder plant may become precedents for similar operations in the future, we believe it is important that care be taken in their formulation. In this regard, we offer the following preliminary suggestions and/or recommendations:

1. Evaluation of the dismantlement operation should be based on a systems approach. That is to say, consideration should be given to ways in which the associated regulatory criteria can help minimize the volumes of waste generated, as well as facilitate their handling, transport, and disposal.
2. Overall, the criteria should be as nonprescriptive as possible; acceptable levels of residual contamination should be clearly defined and justified; and the establishment of overly restrictive limits (for example, at the level of "no detectable activity") should be avoided. One consideration in the establishment of residual radionuclide limits should be the potential for long-term contamination of groundwater.
3. The assumption should be made that the site on which the dismantled facility was located may some day be released for use by members of the public. For this reason, exposures well in excess of an occupational time of 2,000 hours per year should be considered.
4. To the extent practical, maximum benefit should be taken of the experience gained in the decommissioning of related facilities, such as the Shippingport Atomic Power Station.
5. Although adequate quality assurance (QA) conditions should be required, including confirmation that representative samples are collected for evaluating specific conditions, care must be taken to avoid burdening licensees with excessive QA requirements.

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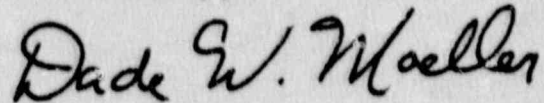
The Honorable Kenneth M. Carr

- 2 -

October 18, 1989

We look forward to follow-up meetings with the NRC staff after issuance of the Safety Evaluation Report on the dismantlement of the Pathfinder plant.

Sincerely,

A handwritten signature in cursive script that reads "Dade W. Moeller". The signature is written in dark ink and is positioned above the typed name and title.

Dade W. Moeller
Chairman