



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

SEP 25 1990

Sanford Cohen & Associates, Inc.  
1311 Dolley Madison Boulevard  
McLean, VA 22101  
ATTN: David Goldin

Dear Mr. Goldin:

Subject: Task Order No. 4 Entitled, Rulemaking Support for  
Decommissioning of Nuclear Facilities, Under Contract No.  
NRC-04-90-070

Verbal authorization was provided to S. Cohen & Associates on September 25, 1990, to commence work effective September 26, 1990 under Task Order No. 4, with an established ceiling of \$29,957.00.

In accordance with Section G.9 entitled "Task Order Procedures" and G.10, entitled "Accelerated Task Order Procedures" of the subject contract, this letter definitizes Task Order No. 4. This effort shall be performed in accordance with the enclosed Statement of Work, and the contractor's proposal dated September 5, 1990, incorporated herein by reference.

Task Order No. 4 shall be in effect from September 26, 1990 through November 26, 1990, with a cost ceiling of \$29,957.00. The amount of \$27,234.00 represents the total estimated reimbursable costs and amount of \$2,723.00 represents the fixed fee.

The issuance of this task order does not amend any terms or conditions of the subject contract.

Your contacts during the course of this task order are:

Technical Matters:           Sidney Feld  
                                  Project Officer  
                                  (301) 492-3748

Contractual Matters:        Beverly Anker  
                                  Contract Administrator  
                                  (301) 492-4741

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Accounting Data for Task Order No. 4 is as follows:

B&R No.:	0601925040
FIN No.:	L12240
Appropriation No.:	31X0200.600
Obligated Amount:	\$29,957.00

Please indicate your acceptance of this task order by having an official, authorized to bind your organization, execute three copies of this document in the space provided and return two copies to the Contract Administrator. You should retain the third copy for your records.

Sincerely,

*Sharon A. Bell*

Sharon A. Bell, Contracting Officer  
Contract Administration Branch No. 2  
Division of Contracts and Property  
Management  
Office of Administration

Enclosure:  
As stated

ACCEPTED:

*[Signature]*  
NAME

*President*  
TITLE

*9/25/90*  
DATE

## STATEMENT OF WORK

SC&A, Inc.

Contract NRC-04-90-070, Task 4

### RULEMAKING SUPPORT FOR DECOMMISSIONING OF NUCLEAR FACILITIES

#### OBJECTIVE

The Regulatory Analysis Section within the Regulation Development Branch (RDB) has been approached by the Radiation Protection and Health Effects Branch to develop a Generic Environmental Impact Statement and regulatory analysis for a rulemaking on timeliness in the decommissioning of materials facilities. As a first step in developing these documents, we will need an Options Paper for the rulemaking and an annotated outline of the GEIS.

The Commission's regulations need to be revised to codify the basic principles and criteria which would allow residually-contaminated lands and structures to be released for unrestricted public use. In the final rule on General Requirements for Decommissioning Nuclear Facilities (53 FR 2418) dated June 27 1988, the need and urgency for guidance with respect to residual contamination criteria was expressed. At that time, it was anticipated that an interagency working group organized by the Environmental Protection Agency would develop

necessary Federal Guidance. However, in the absence of significant progress by the interagency working group, the Commission has directed the NRC staff to expedite a residual radioactivity rulemaking because the requirements, once final, will provide licensees with an incentive to complete site decommissionings.

The rule would codify the basic principles and criteria expressed in the anticipated Commission Policy Statement on Exemptions from Regulatory Control. Measurables, in the form of surface and volume radioactivity concentrations and site radioactivity inventory values would be provided in supporting regulatory guidance. The rule should provide a risk-based framework upon which decommissioning activities and license terminations can be accomplished. The framework should assure adequate protection of public health and safety and identify residual radioactivity criteria upon which licensees can confidently develop reasonable and responsible decommissioning plans.

#### WORK TO BE PERFORMED AND EXPECTED RESULTS

##### Task 1

The contractor shall prepare an options paper which clearly defines the problem to be addressed, discusses the advantages of alternative methods for dealing with the problem, select an alternative if appropriate, discuss the rationale for alternative selected, and describe the expected regulatory product or alternative regulatory products. This description should clearly

delineate the scope of each product (i.e., what it would cover and what it would not cover). It should include key requirements or provisions of the proposed regulation. Preliminary estimates or analyses of the impact (e.g., costs) on licensees and the benefits (e.g., increased safety) of various options under consideration should be included. The time and effort needed to complete the rulemaking effort should also be included.

A key item is the description of the expected regulatory product. However, care must be taken to make it clear that this is only a preliminary description based on the best thinking of the staff given the present state of knowledge and would likely change as a result of feedback during review and discussions or based on more detailed regulatory analyses which must precede development of the actual regulatory product. The content and purpose of this options paper are discussed in an April 6, 1990 memorandum from James C. Malaro to Bill M. Morris entitled "Plan for Development of Early Consensus on Regulatory Products."

#### Task 2

The contractor shall prepare a detailed annotated outline of the subjects to be covered in the Generic Environmental Impact Statement which will be developed to support the rulemaking. As part of this task, the contractor shall identify the important issues to be addressed and discuss how they will be handled in the GEIS.

### DELIVERABLES

The contractor shall deliver to the NRC an options paper as described in Task 1 and an annotated outline for the GEIS as described in Task 2 within 30 days of NRC authorization to initiate work. The contractor shall revise the paper and outline, as directed by the Task Manager, based on NRC staff discussions and comments.

### PERIOD OF PERFORMANCE

The contractor will complete the task by November 26, 1990.

### LEVEL OF EFFORT

It is estimated that this task will require approximately twelve staff-weeks of effort.