



February 8, 1994

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1000 CARSON STREET
TORRANCE, CALIFORNIA 90509

Samuel Chilk, Secretary
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Attention: Docketing and Service Branch
Subject: Draft Radiological Criteria for
Decommissioning; letter dated 27 Jan 94.

Dear Mr. Chilk:

As a participant in the Enhanced Participatory Rulemaking Process, I have been eager to see the results of so much time, energy, and expense on the ability of NRC to make scientifically excellent standards for decommissioning that would validate the continued efforts of NRC in this regulatory area. After all, the mandate to EPA supersedes that of NRC, and one may reasonably ask why citizens should support EPA's efforts from general funds and then support repetitive efforts by NRC which are paid for by already exorbitant User Fees.

Unfortunately, I am very disappointed with NRC's results for three principal reasons. First, the 3 mrem and 15 mrem/yr TEDE values are absurdly low, and appear to represent abandonment of hard scientific reasoning in favor of political groveling to irrational antinuclear terrorists who will never be satisfied anyway. Three mrem represents approximately three days of background radiation to the average American. Fifteen mrem represents the radiation dose incurred from 3 cross-country airplane trips. Background radiation doses in the United States range from about 250-900 mrem; it is bizarre for an independent scientific agency to even deign to bother with negligible doses like 3-15 mrem. This is not a "safe limit"; this is an abandonment of mandate. I'm not sure we could even measure this low, especially with the inherent variability in background from night to day (changes in solar proton flux), from changes in cloud cover, from changes in humidity, from changes in atmospheric pressure, and from natural catastrophes. How much extra radon gas comes out of the ground with an earthquake of 6.8 (Richter) or a Mt. St. Helen's eruption?

The second reason I am disappointed is the complete lack of attention paid to the cost of cleanup to this extremely low

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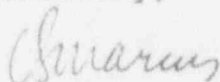
level. NRC is apparently completely unconcerned with the cost of cleanup to 50 to 100 mrem/yr as opposed to 3-15. As we are not talking about safe standards but political standards, NRC should definitely consider cost.

The third reason I think this standard is inappropriate is the intricate and carefully constructed mechanism by which "antinukes" on these Site Specific Advisory Boards (SSAB's) can absolutely block progress by their usual methods. Nothing of significance will ever be decommissioned with this mechanism outlined by the (Anti)- Nuclear Regulatory Commission.

However, maybe that is exactly NRC's intent. With 6 nuclear power plants closed in the past 3 years, and 25 or so expected to close in the next 7 years, NRC will lose about 30% of its power plants. At \$3 million each, a lot of User Fees would be lost if plants were to be decommissioned. As long as decommissioning could not occur, the licensees would have to continue to pay NRC.

In conclusion, I think that the NRC has performed poorly and should stop its effort in this area; perhaps EPA will do better. These standards are not worth our User Fees. Greenpeace would have written them for nothing.

Sincerely,



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and
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