



March 4, 1994
RA-0144-94

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The Secretary of the Commission
Attn: Docketing and Service Branch
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Dear Sir:

Chem-Nuclear Systems, Inc. submits the following comments on the draft rule on Radiological Criteria for Decommissioning of NRC-Licensed Facilities.

GENERAL COMMENT:

The NRC's selection of a specific dose limit for an individual as the criteria for decommissioning is more appropriate than establishing a technology based criteria. The inclusion of a goal to return the site to background levels is reasonable as long as this goal does not become the de facto criteria.

SPECIFIC COMMENTS:

1. 20.1403(c) states that all readily removable residual activity shall be removed. No method for demonstrating compliance with this requirement is given. Cleaning a contaminated surface using common housekeeping techniques, as suggested, will not eliminate all measurable removable activity. Please define "all readily removable activity" and specify a method for demonstrating attainment of this requirement.
2. The decommissioning goal stated in 20.1404(a) is unnecessarily complex. As stated, meeting the goal requires meeting Condition 1 and Condition 2. If there are any residual radionuclides distinguishable from background Condition 1 is violated. If Condition 1 is met, Condition 2 is irrelevant. Since the criteria is to come as close to the decommissioning goal as reasonably achievable, Condition 2 is unnecessary.
3. 20.1404(b) requires cleanup for Unrestricted Release that will result in doses less than 15 mrem/yr and "as close to the decommissioning goal as is reasonably achievable." Without a specific definition of "reasonably achievable", the endpoint of decommissioning is uncertain.

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A possible definition of "reasonable" may be to specify a percentage of the cost of the decontamination required to meet the 15 mrem/yr standard that should not be exceeded in performing additional decontamination.

4. 20.1407 defines the Site Specific Advisory Board (SSAB) as including representatives from state and local government, members of the public, and affected parties and interest groups. To maximize the effectiveness of this group, especially when presenting the final decommissioning decision to the local public, it seems appropriate to have the NRC officially represented on the SSAB. The mission of the SSAB should also include consensus building in the local community once a final D&D plan is approved.

Thank you for providing this opportunity to comment on these proposed regulations. We will be glad to provide comments on your intended guidance on monitoring techniques and calculation of doses from residual radioactivity. If you have any questions, please feel free to contact us.

Sincerely,

CHEM NUCLEAR SYSTEMS, INC.



William B. House
Corporate Director of Licensing

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