

From: Michael F. Weber (MFW)
To: CH1(wla),jdc
Date: Tuesday, November 24, 1992 9:20 am
Subject: UPDATE ON THE ENHANCED PARTICIPATORY RULEMAKING

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action to
Brooke

Weekly update on the Enhanced Participatory Rulemaking on Radiological Criteria for Decommissioning (Action requested in item 4):

1. Please find attached a revised schedule for the rulemaking. The schedule for the simulation workshop in early January was pushed back a week to accommodate Hugh Thompson's schedule. The Atlanta workshop in the end of April was also adjusted somewhat to avoid a previously scheduled commitment of the facilitator.

2. The rulemaking team came to agreement on the revised issues paper for the workshops at our meeting yesterday with Hugh Thompson. Thanks to those of you who reviewed the document and provided comments to me by yesterday morning. I will send you the revised paper as soon as it becomes available from RES. We intend to send out this revised paper along with the invitations and Federal Register notice by the end of next week.

3. Chip Cameron and Don Cool briefed the Advisory Committee on Nuclear Waste about the rulemaking on Friday, November 20. The Committee (especially Dr. Steindler) appeared skeptical of the merits of the workshop process and questioned the benefit of the regional workshops. Chip explained that the Commission selected this approach based on the lessons it had learned on the ill-fated BRC policy, where opposition to the policy was grounded more in problems with the process that NRC used (or appeared to have used) to develop the policy rather than the merits of the policy itself. Chip promised a future briefing for the Committee on the substantive rulemaking issues after the rulemaking issues paper is finalized.

4. We are also preparing case studies to be distributed to invited participants in the workshops. The Commission requested the staff to prepare and distribute the case study information to provide the participants with "real world" examples of actual decommissioning cases -- what worked and what did not, what criteria applied, what kind of contamination was present, what residual contamination levels were actually attained, and how much did it cost? NMSS has taken the lead in preparing these case studies at the request of RES. We plan to provide about 6 brief and representative case studies in the following format:

- Description of site and facility
- Nature and Extent of Contamination

- Cleanup Criteria
- ALARA Analysis (if any)
- Cost of cleanup and decommissioning
- Problems encountered
- Final resolution
- Lessons learned

We plan to provide these to the invited participants, after the rulemaking team has completed its review, in early January. Our interim milestone is to complete drafts of the case studies for circulation by December 18.

ACTION

Please identify any candidate case studies of completed decommissioning actions and inform Mike Weber or Bill Lahs (504-2569 or WRL) by December 4, 1992. Some candidate studies that we have tentatively identified include: Pathfinder and Shippingport (Reactors) and UNC-Montville or Wood River Junction (Fuel facilities). The Commission also identified a DOD cleanup action as an example of a cleanup that failed because of inappropriate cleanup criteria. I would also like to include some cases that are representative of more typical decommissioning actions (e.g., hot cell or laboratory decon at an industrial or medical facility). If you have any candidates, please inform us promptly so that we can compile the information to meet the December 18th interim milestone.

Thanks,
Mike Weber (504-1298 or mfw)

Files: ml:SCHEDULE.FXC