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March 8, 1994

Mr. Terry Devine
Conference of Radiation Control Program Directors, Inc.
Office of the Executive Director
205 Capitol Avenue
Frankfort, Kentucky 40601



Dear Mr. ^{TERRY} Devine,

I have attached staff comments on the United States Nuclear Regulatory Commission draft report titled, "Radiological Criteria for Decommissioning."

Should you have any questions or need additional information, please do not hesitate to contact me at (512) 834-6688.

Sincerely,

Ralph S. Heyer, Administrator
Licensing Branch
Division of Licensing, Registration,
and Standards

Enclosure

20.1003 Definitions. Because a limiting individual dose will be used as a decontamination criteria, it may be desirable to delete references to a "critical group" in order to lessen confusion over the need to evaluate individual vs collective dose. One may refer to, and define, a critical individual as the nearest resident or receptor, or on-site resident or receptor.

20.1402 Concepts. Are the restrictions listed in this section intended to be applied independently of each other? If so, then the "and" at the end of the third restriction should be "or".

20.1402 # (1) in the list of restrictions and 20.1405 sub-section (a). Probably need some specific guidance on defining "environmental harm" (i.e. damage to a habitat or an endangered species; alteration of a landform, etc.) or leave out reference to environmental harm if protection of public health is sufficient to also protect the environment.

General. It is suggested that NRC provide training seminars for all agreement state staff, particularly on enhanced sampling and measurement methodologies which must be used to provide input data for dose assessment modeling, and the as-yet undefined dose assessment models which will be required in the evaluation of radiation levels so close to background.

The suggestion that organizations other than governmental radiation control programs could be given the responsibility for long-term monitoring is problematical, at best. Government would be responsible for overseeing the activities of any monitoring organization, so why not let government do it all?

From The Desk Of

Terry Devine

To Don Cool
NRC

This should have been addressed to you.

TD 11 Mar '94