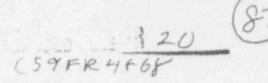
12:04





Texas Department of Health

David R. Smith, M.D. Commissioner

1100 West 49th Street Austin, Texas 78756-3189 (512) 458-7111

Rediation Control (512) 834-6688

Carol S. Daniels Daputy Commissioner for Programs

Roy L. Hogan Deputy Commissioner for Administration

March 8, 1994

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

ERRY Dear Mr. 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

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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 Gool NRC

This should have been addressed to you.

TP 11 Man '94