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February 28, 1994

U.S. Nuclear Regulatory Commission  
ATTN: Donald A. Cool, Chief  
Radiation and Health Effects Branch  
Office of Nuclear Regulatory Research  
Washington, DC 20555

Re: Radiological Criteria for Decommissioning

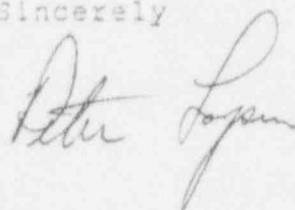
Gentlemen:

I was astonished and dismayed to learn recently about some of the features of your proposed rulemaking on radiological criteria for decommissioning, so I obtained a copy of the "staff draft." After reviewing this document and NUREG/CR-6156, Summary of Comments Received from Workshops on Radiological Criteria for Decommissioning, I realized that the NRC staff has created a regulatory movement that appears to be unstoppable.

While I have no intention to either try to stop this juggernaut or get run over by it, I am especially concerned about the measurements that would be needed to demonstrate compliance with the inappropriate "goal" and "limit" in the staff draft. In Section 11 of the draft, Demonstrating Compliance, you state that, prior to the effective date of the final rule, you plan to issue specific guidance which includes conservative radiation levels, surface contamination limits, and radioactivity concentrations for use by licensees who elect not to apply models to demonstrate compliance, and that guidance on measurements covering these subjects will also be provided.

It is essential that you issue the guidance, even if it is only in draft form, at the same time you submit the proposed rule for Commission review and consideration, so that the Commission can recognize the extreme difficulty, sophistication, and cost of demonstrating compliance with the criteria. It would be deceptive and irresponsible not to do so.

Sincerely



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