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USNRC

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DOCKET NUMBER
PROPOSED RULE PR 20
(59FR 4868)

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH
March 01, 1994

Secretary, U.S. Nuclear Regulatory Commission
ATTN: Docketing and Service Branch
Washington, DC 20555

Dear Secretary:

SUBJECT: COMMENTS ON DEVELOPING RADIOLOGICAL CRITERIA
FOR DECOMMISSIONING (NRC DRAFT)

As requested, we are providing comments concerning the NRC's proposed amendment to 10 CFR Part 20 of its regulations to provide specific radiological criteria for the decommissioning of soils and structures.

After reading the draft proposal, I support the NRC's plan to develop and establish radiological decommissioning standards. As noted in this document, the NRC standards should be technologically-based, but encourage the public's involvement through participating in the development of the criteria in this rulemaking, and through participation of Site Specific Advisory Boards as specified in this rule. It is important for the public to not only be fully informed of the decommissioning actions at a particular site but also to be able to effectively participate in site decommissioning decisions.

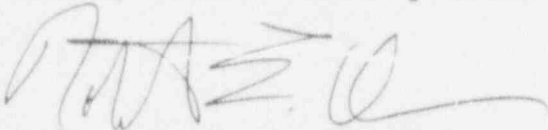
Also, I like the idea that the proposed rule provides for both unrestricted release and restricted termination of the license under prescribed conditions. This document noted that the NRC considered the possible need for radiation standards specifically designed to protect the environment. As such, the Commission concludes that the radiological criteria in the proposed rule which are designed to protect public health should also provide adequate environmental protection. Although this analysis appears to be acceptable, there may be environmental or cultural issues which may require special consideration; and as stated in this NRC draft, these issues can best be handled on a site-by-site basis.

My staff and I are looking forward to receiving the draft Generic Environmental Impact Statement (GEIS) which requires federal agencies to incorporate environmental issues into their

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decision-making process. We appreciate the opportunity for local and state governments to provide comments and suggestions concerning this draft NRC Decommissioning proposal, and the draft GEIS. If we can provide additional comments or information, please contact Harvey B. Brugger of my staff at (614) 644-2727 during normal working hours.

A handwritten signature in black ink, appearing to read "REO", with a long horizontal flourish extending to the right.

Robert E. Owen, Chief
Bureau of Radiological Health

REO/DCB/dcb
CC: Harvey B. Brugger
Dwain C. Baer